

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

SIERRA CLUB,)
)
)
Plaintiff,) Case No. 1:11-cv-00071
v.) Hon. Paul L. Maloney
)
CITY OF HOLLAND and HOLLAND)
BOARD OF PUBLIC WORKS,)
)
Defendants.)

**DECLARATION OF DAVID C. BENDER IN SUPPORT OF PLAINTIFF'S
SECOND MOTION FOR PARTIAL SUMMARY JUDGMENT REGARDING
DEFENDANTS' LIABILITY FOR OPACITY VIOLATIONS**

EXHIBIT Q:

Defendants' Title V Renewable Operating Permit
(Permit No. MI-ROP-B2357-2006a)



Michigan Department of Environmental Quality
Air Quality Division

EFFECTIVE DATE: October 10, 2006

REVISION DATE: November 13, 2007

ISSUED TO

Holland Board of Public Works (BPW) Generating Station and WWTP

State Registration Number (SRN): B2357

LOCATED AT

64 Pine Avenue, Holland, Michigan 49423

RENEWABLE OPERATING PERMIT

Permit Number: MI-ROP-B2357-2006a

Expiration Date: October 10, 2011

Administratively Complete ROP Renewal Application
Due Between April 10, 2010 and April 11, 2011

This Renewable Operating Permit (ROP) is issued in accordance with and subject to Section 5506(3) of Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). Pursuant to Michigan Air Pollution Control Rule 210(1), this ROP constitutes the permittee's authority to operate the stationary source identified above in accordance with the general conditions, special conditions and attachments contained herein. Operation of the stationary source and all emission units listed in the permit are subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

SOURCE-WIDE PERMIT TO INSTALL

Permit Number: MI-PTI-B2357-2006a

This Permit to Install (PTI) is issued in accordance with and subject to Section 5505(5) of Act 451. Pursuant to Michigan Air Pollution Control Rule 214a, the terms and conditions herein, identified by the underlying applicable requirement citation of Rule 201(1)(a), constitute a federally enforceable PTI. The PTI terms and conditions do not expire and remain in effect unless the criteria of Rule 201(6) are met. Operation of all emission units identified in the PTI is subject to all applicable future or amended rules and regulations pursuant to Act 451 and the federal Clean Air Act.

Michigan Department of Environmental Quality

William A. Presson, Action Permit Section Supervisor

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AUTHORITY AND ENFORCEABILITY

For the purpose of this permit, the **permittee** is defined as any person who owns or operates an emission unit at a stationary source for which this permit has been issued. The **department** is defined in Rule 104(d) as the Director of the Michigan Department of Environmental Quality (MDEQ) or his or her designee.

The permittee shall comply with all specific details in the permit terms and conditions and the cited underlying applicable requirements. All terms and conditions in this ROP are both federally enforceable and state enforceable unless otherwise footnoted. Certain terms and conditions are applicable to most stationary sources for which an ROP has been issued. These general conditions are included in Part A of this ROP. Other terms and conditions may apply to a specific emission unit, several emission units which are represented as a flexible group, or the entire stationary source which is represented as a source-wide group. Special conditions are identified in Parts B, C, D and/or the appendices.

In accordance with Rule 213(2)(a), all underlying applicable requirements will be identified for each ROP term or condition. All terms and conditions that are included in a PTI, are streamlined or subsumed, or are state-only enforceable will be noted as such.

In accordance with Section 5507 of Act 451, the permittee has included in the ROP application a compliance certification, a schedule of compliance, and a compliance plan. For applicable requirements with which the source is in compliance, the source will continue to comply with these requirements. For applicable requirements with which the source is not in compliance, the source will comply with the detailed schedule of compliance requirements that are incorporated as an appendix in this ROP. Furthermore, for any applicable requirements effective after the date of issuance of this ROP, the stationary source will meet the requirements on a timely basis, unless the underlying applicable requirement requires a more detailed schedule of compliance.

Issuance of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.

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A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (**R 336.1213(5)**)
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (**R 336.1213(5)(a), R 336.1214a(5)**)
- Those conditions that are hereby incorporated in federally enforceable Source-wide PTI No. MI-PTI-B2357-2006a pursuant to Rule 201(2)(c) are designated by footnote two. (**R 336.1213(5)(b), R 336.1214a(3)**)

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. (**R 336.1213(1)(a)**)
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (**R 336.1213(1)(b)**)
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (**R 336.1213(1)(c)**)
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (**R 336.1213(1)(d)**):
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

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and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

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Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate (**R 336.1213(3)(b)**):
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (**R 336.1213(1)(e), R 336.1213(3)(b)(ii)**)

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (**R 336.1213(3)(c)**)
19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (**R 336.1213(4)(c)**)
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (**R 336.1213(4)(c)**)
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (**R 336.1213(3)(c)**)
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

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22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
 - a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - c. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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- d. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
- 28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
 - a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
- 29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

- 30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
- 31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
- 32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
- 33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

- 34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
 - a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

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Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(7))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
a. June 21, 1999,
b. Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
c. The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

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Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² **(R 336.1201(1))**
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² **(R 336.1201(8), Section 5510 of Act 451)**
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² **(R 336.1219)**
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² **(R 336.1201(4))**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

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SOURCE-WIDE CONDITIONS; ASBESTOS NESHAP

DESCRIPTION

Asbestos NESHAP (40 CFR 61, Subpart M) and report certification requirements.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

NA

See Appendix 1-5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall maintain waste shipment records of all asbestos-containing waste material transported off the facility site in accordance with the provisions of **40 CFR 61.150(d)(1),(2) and (3)**.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)

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3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each responsible official shall certify annually the compliance status of the stationary source with all stationary source-wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). **(R 336.1213(4)(c))**
5. For all renovation of regulated asbestos containing material and demolition required to submit notification under 40 CFR 61.145(a), the permittee shall provide notification to AQD in accordance with the provisions of **40 CFR 61.145(b)**.
6. With the exception of ordered demolitions, as defined by 40 CFR 61.145(a)(3), the permittee shall provide the notification at least ten working days prior to the onset of any activity that would break up, dislodge or similarly disturb asbestos material. **(40 CFR 61.145 (b))**
7. For ordered demolitions, as defined by **40 CFR 61.145(a)(3)**, the permittee shall provide such notification no later than the following work day after the onset of any activity that would break up, dislodge or similarly disturb asbestos material.
8. The permittee shall provide notification to AQD for all instances where a waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the permittee within 45 days of the date the waste was accepted by the initial transporter, in accordance with the provisions of **40 CFR 61.150(d)(4)**.

See Appendix 1-8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall perform renovation of all regulated asbestos containing material (RACM) in accordance with **40 CFR 61.145(c)**, and if applicable, **Appendix A of 40 CFR Part 61, Subpart M**.
2. The permittee shall dispose all RACM in accordance with the provisions of **40 CFR 61.150(a),(b) and (c)**.
3. The permittee shall comply with all applicable portions of **40 CFR Part 61, Subpart M - National Emission Standard for Asbestos** and **40 CFR Part 61, Subpart A - General Provisions**.

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-FLYASH-SILO	Flyash silo 80 feet above ground with a 20 foot diameter. Emissions from the silo are controlled by a Beckert & Heister baghouse.	01-01-1967/ 01-01-1983	NA
EU-UNIT-3	Riley-stoker RP wall-fired, dry bottom, coal and natural gas fired boiler. It is controlled by an electrostatic precipitator (ESP). The rated capacity is 11.5 megawatts (MW) and 125,000 pounds of steam per hour.	01-01-1950/ 05-01-1984	NA
EU-UNIT-4	Riley-stoker r4-2 wall-fired, dry bottom, coal and natural gas fired boiler. It is controlled by an ESP preceded by a cyclone separator. The rated capacity is 22 MW and 220,000 pounds of steam per hour.	01-01-1961/ 09-01-1977	NA
EU-UNIT-5	Combustion Engineering, Inc, Model UV-40s, wall-fired, coal and natural gas fired boiler. It is controlled by an ESP. The rated capacity is 29 MW and 290,000 pounds of steam per hour.	01-01-1968/ 05-01-1984	NA
EU-COLD-CLEANER	Remote reservoir cold cleaner using a safety-kleen petroleum distillate solvent. The solvent has a maximum vapor pressure of 2 millimeters of Mercury (mmHg) (0.04 psia) and is not heated.	12-31-1990/ NA	FG-COLD-CLEANERS

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EU-FLYASH-SILO EMISSION UNIT CONDITIONS

DESCRIPTION

Flyash silo 80 feet above ground with a 20 foot diameter. Emissions from the silo are controlled by a Beckert & Heister baghouse.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Baghouse

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.10 pound per 1,000 pounds exhaust gas (dry basis)	At all times, as verifiable through any requested stack testing	Each baghouse discharge point	S.C. VI.1 S.C. VI.2 (Periodic checks of delta P and visible emissions; see Appendices 1-3.1 and 1-3.2)	R 336.1331(c), Table 31(J)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the silo unless the baghouse is installed and operating properly. (**R 336.1910**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall assess opacity using U.S. EPA Reference Method 9 - "Visual Determination of the Opacity of Emissions from Stationary Sources", upon the request of AQD. (**R 336.1213(3)**)

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2. The permittee shall assess particulate matter emissions using U.S. EPA Reference Method 5 – “Determination of Particulate Emissions from Stationary Sources”, upon the request of AQD. (**R 336.1213(3)**)

See Appendix 1-5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall monitor and record the differential pressure across the baghouse, while in operation, on a weekly basis. (**R 336.1213(3)**)
2. The permittee shall conduct and record non-certified visual inspections for opacity from the baghouse while it is in operation. These inspections shall be performed at a minimum of 4 out of 7 days per calendar week. (**R 336.1213(3)**)
3. The permittee shall implement the Environmental Inspection program outlined in Appendix 1-3.2, Environmental Inspection. (**R 336.1213(3)**)

See Appendices 1-3.1 (EU-FLYASH-SILO) and 1-3.2 (Environmental Inspection)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)
4. Emission test plans and schedules shall have prior approval of the AQD. A complete report of the test results shall be submitted in accordance with AQD requirements. (**R 336.2001, R 336.2002, and R 336.2004**)

See Appendix 1-8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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EU-UNIT-3 EMISSION UNIT CONDITIONS

DESCRIPTION

Riley-stoker RP wall-fired, dry bottom, coal and natural gas fired boiler. It is controlled by an electrostatic precipitator (ESP). The rated capacity is 11.5 MW and 125,000 pounds of steam per hour.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Electrostatic precipitator (ESP)

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.30 pound per 1,000 pounds of exhaust gas, corrected to 50% excess air ²	At all times, as verifiable through required stack testing	EU-UNIT-3	S.C. V.1 S.C. VI.1 S.C. VI. 3 through 11 (Stack test; Compliance Assurance Monitoring (CAM) Plan based on COMS; see Appendices 1-3.3 and 1-3.4)	R 336.1331(1)(a), Table 31(A), Figure 31
2. Sulfur Oxides	1.67 pounds per million Btu (mmBtu) heat input ²	Average of all operating hours in a calendar day	EU-UNIT-3	S.C. VI.2 (Sulfur-in-fuel monitoring; see Appendix 1-3.5)	R 336.1201(3)
3. Opacity	20%, except for one 6-minute period per hour of not more than 27%	6-minute averages	EU-UNIT-3	S.C. V.2 through 4 S.C. VI. 1	R 336.1301(1)(a)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

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III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the units, including startup and shutdown, unless the electrostatic precipitators are installed and operating properly, in accordance with safe operating practices.² (**R 336.1301, R 336.1330, R 336.1331, R 336.1910**)
2. The permittee shall not operate the boiler unless all provisions of Rule 330 are met for each precipitator. (**R 336.1330**)
3. The permittee shall not operate the boiler unless a program describing preventative maintenance (Compliance Assurance and Monitoring Plan for the Electrostatic Precipitators at the James De Young Generating Station) for the electrostatic precipitator is maintained and implemented. (**R 336.1213(3)**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. Once every three years, or more frequently upon request of the AQD, permittee shall verify the PM emission rate from EU-UNIT-3 by testing, utilizing U.S. EPA Reference Method 5 (Determination of Particulate Emissions from Stationary Sources) OR U.S. EPA Reference Method 17 (Determination of Particulate Emissions from Stationary Sources (In-stack Filtration Method)), at permittee's expense, and in accordance with Department requirements. Verification of emission rates includes the submittal of a complete report of the test results within 60 days of test completion. (**R 336.1213(3), R 336.2001, R 336.2003, R 336.2004**)
2. The permittee shall assess opacity using U.S. EPA Reference Method 9 - "Visual Determination of the Opacity of Emissions from Stationary Sources", upon the request of the AQD. (**R 336.1213(3)**)
3. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. (**R 336.1213(3)**)
4. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. (**R 336.2001(3)**)

See Appendix 1-5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall monitor and record the opacity from EU-UNIT-3 using a Continuous Opacity Monitoring System (COMS), installed, operated and maintained in accordance with **40 CFR, Part 60, Appendix A.**² (**R 336.2101**)
2. The permittee shall monitor fuel sulfur content per Appendix 1-3.5. (**R 336.1213(3)**)
3. The permittee shall utilize COMS-recorded opacity as an indicator of the proper functioning of the electrostatic precipitators. The appropriate range of opacity defining proper functioning of the electrostatic precipitators is 0-12% opacity for a 24-hour period, and 0-20% opacity for a 2-hour period. (**40 CFR 64.6(c)(1)(i and ii)**)
4. The permittee shall continuously record opacity; six-minute average values shall be based on 24 or more equally spaced instantaneous opacity measurements per six-minute period. (**40 CFR 64.6(c)(1)(iii)**)
5. The permittee shall complete daily zero and calibration tests; conduct necessary preventative maintenance; and demonstrate adequate performance through an annual monitor audit. (**40 CFR 64.6(c)(1)(iii)**)

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6. An excursion will occur if opacity in excess of 12% is recorded for a duration exceeding 24 hours, or in excess of 20% for a duration exceeding 2 hours. (**40 CFR 64.6(c)(2)**)
7. The permittee shall conduct all required monitoring per the CAM Plan attached as **Appendix 1-3.5** and otherwise satisfy the requirements specified in 40 CFR 64.7 through 40 CFR 64.9 (**40 CFR 64.6(c)(3)**, **40 CFR 64.7(a)**)
8. The permittee shall properly maintain the monitoring systems, including maintaining necessary parts for routine repairs of the monitoring equipment. (**40 CFR 64.7(b)**)
9. The required monitoring systems shall collect data for all required intervals when the emission unit is operating. (**40 CFR 64.7(c)**)
10. The permittee shall restore operation of the emission unit, control device, and associated pollutant capture system equipment to normal/compliant operation as quickly as possible in response to any noted exceedance or excursion. (**40 CFR 64.7(d)**)
11. The permittee shall promptly notify AQD for the need to modify the CAM Plan if it is found to be inadequate, and shall submit a proposed modification to the ROP if necessary. (**40 CFR 64.7(e)**)

See Appendices 1-3.3 (Continuous Opacity Monitoring Systems), 1-3.4 (CAM Plan), and 1-3.5 (Fuel Sulfur Monitoring)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)
4. The permittee shall submit quarterly reports for opacity pursuant to R 336.1270. These quarterly reports shall be submitted in an acceptable format within 30 days following the end of the calendar quarter in which the data were collected. (**R 336.1213(3)**)
5. The permittee shall submit a complete test report of the test results to the AQD within 60 days following the last date of the test. (**R 336.2001(4)**)
6. Each semiannual report of monitoring deviations shall include summary information on the number, duration, and cause of exceedances/excursions in the reporting period; and the corrective actions taken in response. If there were no excursions/exceedances in the reporting period, then this report shall include a statement that there were no excursions/exceedances. (**40 CFR 64.9(a)(2)(i)**, **R 336.1213(3)(c)**)
7. Each semiannual report of monitoring deviations shall include summary information on monitor downtime in the reporting period. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. (**40 CFR 64.9(a)(2)(ii)**, **R 336.1213(3)(c)**)
8. Each semiannual report of monitoring deviations shall include a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period, if appropriate. If a QIP has been completed, the report shall include documentation that the QIP has been implemented, and a discussions pertaining to whether the QIP implementation has reduced the likelihood of excursions or exceedances. (**40 CFR 64.9**)

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See Appendix 1-8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-UNIT-3	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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EU-UNIT-4

EMISSION UNIT CONDITIONS

DESCRIPTION

Riley-stoker r4-2 wall-fired, dry bottom, coal and natural gas fired boiler. It is controlled by an ESP preceded by a cyclone separator. The rated capacity is 22 mw and 220,000 pounds of steam per hour.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Cyclone, Electrostatic Precipitator

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.26 pound per 1,000 pounds of exhaust gas, corrected to 50% excess air ²	At all times, as verifiable through required stack testing	EU-UNIT-4	S.C. V.1 S.C. VI.1 S.C. VI. 3 through 11 (Stack test; Compliance Assurance Monitoring (CAM) Plan; see Appendices 1-3.3 and 1-3.4)	R 336.1331(1)(a), Table 31(A), Figure 31
2. Sulfur Oxides	1.67 pounds per million Btu (mmBtu) heat input ²	Average of all operating hours in a calendar day	EU-UNIT-4	S.C. VI.2 (Sulfur-in-fuel monitoring; see Appendix 1-3.5)	R 336.1201(3)
3. Oxides of Nitrogen	1.0 pound per mmBtu	Average over the defined ozone control period	EU-UNIT-4	S.C. VI.12 (Previous stack test results and current monitoring of heat input)	R 336.1801(4)(h)
4. Opacity	20%, except for one 6-minute period per hour of not more than 27%	6-minute averages	EU-UNIT-4	S.C. V.2 through 4 S.C. VI. 1	R 336.1301(1)(a)

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the units, including startup and shutdown, unless the electrostatic precipitators are installed and operating properly, in accordance with safe operating practices.² (**R 336.1301, R 336.1330, R 336.1331, R 336.1910**)
2. The permittee shall not operate the boiler unless all provisions of Rule 330 are met for each precipitator. (**R 336.1330**)
3. The permittee shall not operate the boiler unless a program describing preventative maintenance (Compliance Assurance and Monitoring Plan for the Electrostatic Precipitators at the James De Young Generating Station) for the electrostatic precipitator is maintained and implemented.² (**R 336.1213(3)**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. Once every three years, or more frequently upon request of the AQD, the permittee shall verify the PM emission rate from EU-UNIT-4 by testing, utilizing U.S. EPA Reference Method 5 (Determination of Particulate Emissions from Stationary Sources) OR U.S. EPA Reference Method 17 (Determination of Particulate Emissions from Stationary Sources (In-stack Filtration Method)), at permittee's expense, and in accordance with Department requirements. Verification of emission rates includes the submittal of a complete report of the test results within 60 days of test completion. (**R 336.1213(3), R 336.2001, R 336.2003, R 336.2004**)
2. The permittee shall assess opacity using U.S. EPA Reference Method 9 - "Visual Determination of the Opacity of Emissions from Stationary Sources", upon the request of the AQD. (**R 336.1213(3)**)
3. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. (**R 336.1213(3)**)
4. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. (**R 336.2001(3)**)

See Appendix 1-5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall monitor and record the opacity from each boiler using a Continuous Opacity Monitoring System (COMS), installed, operated and maintained in accordance with **40 CFR, Part 60, Appendix A**. (**R 336.2101**)
2. The permittee shall monitor fuel sulfur content per Appendix 1-3.5. (**R 336.1213(3)**)

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3. The permittee shall utilize COMS-recorded opacity as an indicator of the proper functioning of the electrostatic precipitators. The appropriate range of opacity defining proper functioning of the electrostatic precipitators is 0-12% opacity, and 0-20% opacity for a 2-hour period. (**40 CFR 64.6(c)(1)(i and ii)**)
4. The permittee shall continuously record opacity; six-minute average values shall be based on 24 or more equally spaced instantaneous opacity measurements per six-minute period. (**40 CFR 64.6(c)(1)(iii)**)
5. The permittee shall complete daily zero and calibration tests; conduct necessary preventative maintenance; and demonstrate adequate performance through an annual monitor audit. (**40 CFR 64.6(c)(1)(iii)**)
6. An excursion will occur if opacity in excess of 12% is recorded for a duration exceeding 24 hours, or in excess of 20% for a duration exceeding 2 hours. (**40 CFR 64.6(c)(2)**)
7. The permittee shall conduct all required monitoring per the CAM Plan attached as **Appendix 1-3.5** and otherwise satisfy the requirements specified in 40 CFR 64.7 through 40 CFR 64.9. (**40 CFR 64.6(c)(3), 40 CFR 64.7(a))**
8. The permittee shall properly maintain the monitoring systems, including maintaining necessary parts for routine repairs of the monitoring equipment. (**40 CFR 64.7(b))**
9. The required monitoring systems shall collect data for all required intervals when the emission unit is operating. (**40 CFR 64.7(c))**
10. The permittee shall restore operation of the emission unit, control device, and associated pollutant capture system equipment to normal/compliant operation as quickly as possible in response to any noted exceedance or excursion. (**40 CFR 64.7(d))**
11. The permittee shall promptly notify the AQD for the need to modify the CAM Plan if it is found to be inadequate, and shall submit a proposed modification to the ROP if necessary. (**40 CFR 64.7(e))**
12. The permittee shall monitor and record NOx emissions during the defined ozone control period by utilizing published AP-42 emission factors and unit heat input values (using the minimum tested coal heat content (Btu/lb) of the coal used during the period. The calculation shall be completed each month during the defined ozone control period. (**R 336.1801(8)(c))**

See Appendices 1-3.3 (Continuous Opacity Monitoring Systems), 1-3.4 (CAM Plan), and 1-3.5 (Fuel Sulfur Monitoring)

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c))**
4. The permittee shall submit quarterly reports for opacity pursuant to R 336.1270. These quarterly reports shall be submitted in an acceptable format within 30 days following the end of the calendar quarter in which the data were collected. (**R 336.1213(3))**
5. The permittee shall submit a complete test report of the test results to the AQD within 60 days following the last date of the test. (**R 336.2001(4))**

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6. Each semiannual report of monitoring deviations shall include summary information on the number, duration, and cause of exceedances/excursions in the reporting period; and the corrective actions taken in response. If there were no excursions/exceedances in the reporting period, then this report shall include a statement that there were no excursions/exceedances. (**40 CFR 64.9(a)(2)(i), R 336.1213(3)(c)**)
7. Each semiannual report of monitoring deviations shall include summary information on monitor downtime in the reporting period. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. (**40 CFR 64.9(a)(2)(ii), R 336.1213(3)(c)**)
8. Each semiannual report of monitoring deviations shall include a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period, if appropriate. If a QIP has been completed, the report shall include documentation that the QIP has been implemented, and a discussions pertaining to whether the QIP implementation has reduced the likelihood of excursions or exceedances. (**40 CFR 64.9**)
9. The permittee shall submit an Annual Summary Report of NO_x emissions to the AQD on or before November 29 of each year (if a business day; otherwise on the next business day), as outlined in R 336.1801(12)(a) through (d). (**R 336.1801(12)**)

See Appendix 1-8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-UNIT-4	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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EU-UNIT-5

EMISSION UNIT CONDITIONS

DESCRIPTION

Combustion Engineering, Inc, Model UV-40s, wall-fired, coal and natural gas fired boiler. It is controlled by an electrostatic precipitator. The rated capacity is 29 MW and 290,000 pounds of steam per hour.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Electrostatic Precipitator

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter (PM)	0.25 pound per 1,000 pounds of exhaust gas, corrected to 50% excess air ²	At all times, as verifiable through required stack testing	EU-UNIT-5	S.C. V. 1 S.C. VI. 1 through 10 (Stack test; Compliance Assurance Monitoring (CAM) Plan based on COMS; see Appendices 1-3.3 and 1-3.4)	R 336.1331(1)(a), Table 31(A), Figure 31
2. Sulfur Oxides	1.67 pounds per million Btu (mmBtu) heat input ²	Average of all operating hours in a calendar day	EU-UNIT-5	S.C. VI. 11 S.C. VI. 12 (Sulfur-in-fuel monitoring and Continuous Emissions Monitoring System (CEMS); see Appendices 1-3.5 and 1-3.6)	R 336.1201(3)
3. Opacity	20%, except for one 6-minute period per hour of not more than 27%	6-minute averages	EU-UNIT-5	S.C. V.2 through 4 S.C. VI. 1	R 336.1301(1)(a)

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II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not operate the units, including startup and shutdown, unless the electrostatic precipitators are installed and operating properly, in accordance with safe operating practices.² (**R 336.1301, R 336.1330, R 336.1331, R 336.1910**)
2. The permittee shall not operate the boiler unless all provisions of Rule 330 are met for each precipitator. (**R 336.1330**)
3. The permittee shall not operate the boiler unless a program describing preventative maintenance (Compliance Assurance and Monitoring Plan for the Electrostatic Precipitators at the James De Young Generating Station) for the electrostatic precipitator is maintained and implemented. (**R 336.1213(3)**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. Once every three years, or more frequently upon request of the AQD, permittee shall verify the PM emission rate from EU-UNIT-5 by testing, utilizing U.S. EPA Reference Method 5 (Determination of Particulate Emissions from Stationary Sources) **or** U.S. EPA Reference Method 17 (Determination of Particulate Emissions from Stationary Sources (In-stack Filtration Method)), at permittee's expense, and in accordance with Department requirements. Verification of emission rates includes the submittal of a complete report of the test results within 60 days of test completion. (**R 336.1213(3), R 336.2001, R 336.2003, R 336.2004**)
2. The permittee shall assess opacity using U.S. EPA Reference Method 9 - "Visual Determination of the Opacity of Emissions from Stationary Sources", upon the request of the AQD. (**R 336.1213(3)**)
3. The permittee shall submit a complete test protocol to the AQD for approval at least 30 days prior to the anticipated test date. (**R 336.1213(3)**)
4. The permittee shall notify the AQD no less than 7 days prior to the anticipated test date. (**R 336.2001(3)**)

See Appendix 1-5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall monitor and record the opacity from each boiler using a Continuous Opacity Monitoring System (COMS), installed, operated and maintained in accordance with **40 CFR, Part 60, Appendix A**.² (**R 336.2101**)
2. The permittee shall utilize COMS-recorded opacity as an indicator of the proper functioning of the electrostatic precipitators. The appropriate range of opacity defining proper functioning of the electrostatic precipitators is 0-12% opacity, and 0-20% opacity for a 2-hour period. (**40 CFR 64.6(c)(1)(i and ii)**)

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3. The permittee shall continuously record opacity; six-minute average values shall be based on 24 or more equally spaced instantaneous opacity measurements per six-minute period. (**40 CFR 64.6(c)(1)(iii)**)
4. The permittee shall complete daily zero and calibration tests; conduct necessary preventative maintenance; and demonstrate adequate performance through an annual monitor audit. (**40 CFR 64.6(c)(1)(iii)**)
5. An excursion will occur if opacity in excess of 12% is recorded for a duration exceeding 24 hours, or in excess of 20% for a duration exceeding 2 hours. (**40 CFR 64.6(c)(2)**)
6. The permittee shall conduct all required monitoring per the CAM Plan attached as **Appendix 1-3.5** and otherwise satisfy the requirements specified in 40 CFR 64.7 through 40 CFR 64.9 (**40 CFR 64.6(c)(3), 40 CFR 64.7(a)**)
7. The permittee shall properly maintain the monitoring systems, including maintaining necessary parts for routine repairs of the monitoring equipment. (**40 CFR 64.7(b)**)
8. The required monitoring systems shall collect data for all required intervals when the emission unit is operating. (**40 CFR 64.7(c)**)
9. The permittee shall restore operation of the emission unit, control device, and associated pollutant capture system equipment to normal/compliant operation as quickly as possible in response to any noted exceedance or excursion. (**40 CFR 64.7(d)**)
10. The permittee shall promptly notify the AQD for the need to modify the CAM Plan if it is found to be inadequate, and shall submit a proposed modification to the ROP if necessary. (**40 CFR 64.7(e)**)
11. The permittee shall monitor fuel sulfur content per Appendix 1-3.5. (**R 336.1213(3)**)
12. The permittee shall monitor gas flow, SO₂, CO₂, and NO_x emissions using CEMS, as installed, maintained, and operated in accordance with the provisions of **40 CFR Part 75, Appendix B**.

See Appendices 1-3.3 (Continuous Opacity Monitoring Systems), 1-3.4 (CAM Plan), 1-3.5 (Fuel Sulfur Monitoring), and 1-3.6 (Continuous Emissions Monitoring System (Title IV))

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)
4. The permittee shall submit quarterly reports for opacity pursuant to R336.1270. These quarterly reports shall be submitted in an acceptable format within 30 days following the end of the calendar quarter in which the data were collected. (**R 336.1213(3)**)
5. The permittee shall submit a complete test report of the test results to the AQD within 60 days following the last date of the test. (**R 336.2001(4)**)
6. Each semiannual report of monitoring deviations shall include summary information on the number, duration, and cause of exceedances/excursions in the reporting period; and the corrective actions taken in response. If there were no excursions/exceedances in the reporting period, then this report shall include a statement that there were no excursions/exceedances. (**40 CFR 64.9(a)(2)(i), R 336.1212(3)(c)**)

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7. Each semiannual report of monitoring deviations shall include summary information on monitor downtime in the reporting period. If there were no periods of monitor downtime in the reporting period, then this report shall include a statement that there were no periods of monitor downtime. (**40 CFR 64.9(a)(2)(ii), R 336.1213(3)(c)**)
8. Each semiannual report of monitoring deviations shall include a description of the actions taken to implement a Quality Improvement Plan (QIP) during the reporting period, if appropriate. If a QIP has been completed, the report shall include documentation that the QIP has been implemented, and a discussions pertaining to whether the QIP implementation has reduced the likelihood of excursions or exceedances. (**40 CFR 64.9**)

See Appendix 1-8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-UNIT-5	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall comply with the acid rain permitting provisions of 40 CFR 72.1 to 72.94 as outlined in a complete Phase II Acid Rain Permit issued by the AQD. The Phase II Acid Rain Permit is hereby incorporated into this ROP as **Appendix 1-9. (R 336.1299(d))**
2. The permittee shall not allow the emission of an air pollutant to exceed the amount of any emission allowances that an affected source lawfully holds as of the allowance transfer deadline pursuant to Rule 299(d) and 40 CFR Part 72.9(c)(1)(i). (**R 336.1213(10)**)
3. The permittee shall hold NOx allowances available for compliance deductions under 40 CFR Part 96.54 in the unit's compliance account and the source's overdraft account in an amount not less than the total NOx emissions for the control period from the unit. (**R 336.1805, 40 CFR Part 96.6(c)**)
4. The permittee shall comply with the NOx Budget Trading permitting provisions of 40 CFR Part 96.1 to 96.88, as adopted and as modified by Rules 802 to 816, as outlined in any complete NOx Budget Trading permit issued by the AQD. The NOx Budget Trading permit is hereby incorporated into this ROP as **Appendix 1-10. (R 336.1802)**

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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D. FLEXIBLE GROUP CONDITIONS

Part D outlines terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-COLD-CLEANERS	Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.	EU-COLD-CLEANER

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FG-COLD-CLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EU-COLD-CLEANER

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (**R 336.1213(2)**)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (**R 336.1611(2)(b)**, **R 336.1707(3)(b)**)
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (**R 336.1213(3)**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (**R 336.1281(h)**)
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (**R 336.1285(r)(iv)**)
2. The cold cleaner shall be equipped with a device for draining cleaned parts. (**R 336.1611(2)(b)**, **R 336.1707(3)(b)**)
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (**R 336.1611(2)(a)**, **R 336.1707(3)(a)**)
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (**R 336.1707(3)(a)**)
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (**R 336.1707(2)(a)**)
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (**R 336.1707(2)(b)**)

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- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 1-8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

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APPENDICES

Appendix 1-1: Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

AQD	Air Quality Division	MM	Million
acf m	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H ₂ S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure *	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO ₂	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
m	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfunction Abatement Plan	µg	Microgram
MDEQ	Michigan Department of Environmental Quality	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

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Appendix 1-2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (**R 336.1213(4)(a), R 336.1119(a)(ii)**)

Appendix 1-3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EU-FLYASH-SILO, EU-UNIT-3, EU-UNIT-4, and EU-UNIT-5.

1-3.1 EU-FLYASH-SILO

Monitoring of the baghouse shall be in accordance with the procedures, methods, or specifications referenced in EU-FLYASH-SILO. An alarm has been installed to identify conditions of high differential pressure across the baghouse filter. Visual inspections for opacity will enable identification of any periods of baghouse malfunction.

1-3.2 Environmental Inspection for Visible Emissions

To ensure proper operation of the equipment, a routine inspection for visible emissions shall be performed at a minimum of four (operating days) out of seven days per calendar week. This inspection will include a check of the following equipment and areas:

- Coal and ash handling vents, transport systems, storage and work areas.
- Other areas (parking lots, roads, etc.).

Observations of the differential pressure across the flyash silo baghouse, while in operation, shall be made on a weekly basis.

A record will be made of all checks and abnormal conditions will trigger initiation of control/abatement/repair actions.

1-3.3 Continuous Opacity Monitoring Systems

The Continuous Opacity Monitoring System (COMS) performance specifications defined in 40 CFR Part 60, Appendix B, are adopted.

Cycling time for opacity: complete a minimum of one cycle of sampling/analysis for each successive 10-second period and one cycle of data recording for each successive 6-minute period. (**R 336.2152**)

Zero and Drift: The COMS must be subject to the manufacturer's zero and span check at least once daily. (**R 336.2153**)

Location: The location of the COMS or the monitoring devices must be such that representative measurement of emissions or process parameters are obtained. (**R 336.2155**)

Alternative Systems: The AQD may approve the use of an alternative monitoring system if one is available that meets COMS objectives and if, because of physical limitations or other reasons, COMS cannot be installed or give accurate measurements. (**R 336.2159**)

Monitoring and reporting requirements shall not apply during any period of monitoring system malfunction if it can be demonstrated to the satisfaction of the AQD that: the cause of the malfunction could not have been avoided by any reasonable action and necessary repairs are being made as expeditiously as practicable. (**R 336.2190**)

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1-3.4 CAM PLAN (EU-UNIT-3, EU-UNIT-4, EU-UNIT-5)

Compliance Assurance and Monitoring Plan for Electrostatic Precipitators at the James De Young Generating Station

Last Revised October 12, 2004

This Compliance Assurance and Monitoring plan for the Electrostatic Precipitators (ESPs) has been developed as a means of assuring compliance at the James De Young Generating Station, Holland, Michigan. See 40 CFR 64. This plan aims to maintain compliance through current operating practices, current requirements, and a representative indicator parameter. The underlying premise is, that if the indicator parameter or operating practices are beyond an acceptable threshold the plant staff will investigate the problem and correct the control device or related equipment as expeditiously as practicable to assure compliance.

1.0 Unit and Applicable Regulatory Description

The Holland Board of Public Works (HBPW), James De Young Generating Station (JDY Plant) is made up of 3 coal-fired steam generating units capable of producing up to 60 MW of electricity for residential, industrial, and commercial customers in the Holland area. The plant, located at 64 Pine Avenue, is just within the city limits and is located on Lake Macatawa. The Air Quality Division Source ID No. (SRN) is B2357. A description of the three emission units and their control systems are provided in Table 1:

Table 1 – Emission Units and Controls

Unit ID	ROP Unit ID	Boiler Type	Rated Capacity	Control System
3	EG-UNIT 3	Riley-Stoker RP Wall Fired, Dry Bottom boiler	11.5 MW	ESP
4	EG-UNIT 4	Riley-Stoker R4-2 Wall Fired, Dry Bottom boiler	22 MW	ESP/Cyclone
5	EG-UNIT 5	Combustion Engineering, Model Vu-40S Wall Fired, Dry Bottom Boiler	29 MW	ESP

The ESP control systems are used to reduce particulate and opacity emissions for all three boilers. The Unit 3 and 5 ESP was constructed in 1982. Both units share the same ESP building but have separate ductwork. The ESP for Unit 3 and 5 is located on the south side of the JDY Plant. Unit 4 ESP was constructed in 1977. The unit is located on the roof of the JDY plant next to the Unit 4 stack.

In general all three ESPs are similar, but vary in size and the number of fields. The process of electrostatic precipitation in the ESPs involve (1) the ionization of exhaust gas and particles flowing between electrodes, (2) the charging, migration, and collection of the particles on oppositely charged plates, and (3) the removal of the particles from the plates by a rapping mechanism. In Table 2, below, the applicable emission limitations and regulatory source for each unit is listed as it regards to CAM-regulated particulate and opacity emissions.

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Table 2 – Regulatory Requirements

Unit ID	ROP Unit ID	Emission Limitation	Regulatory Source
3	EG-UNIT-3	Particulate emissions shall not exceed 0.3 lbs/1000 lbs of exhaust gas, corrected to 50% excess air	Michigan Rule 331
3 & 5	EG-UNIT-3 & EG-UNIT-5	Coal fuel shall not be burned unless the ESPs are operating properly	Michigan Rule 330
4	EG-UNIT-4	Particulate emissions shall not exceed 0.26 lbs/1000 lbs of exhaust gas, corrected to 50% excess air	Michigan Permit to Operate
5	EG-UNIT-5	Particulate emissions shall not exceed 0.25 lbs/1000 lbs of exhaust gas, corrected to 50% excess air	Michigan Permit to Operate
3, 4, & 5	EG-UNIT-3, EG-UNIT-4, & EG-UNIT-5	Visible emissions are limited to an opacity of less than or equal to 20%	Michigan Permit to Operate

1.1 Monitoring Requirements

Visual emissions or opacity are required to be monitored on a continuous basis. The data collected is submitted to the Michigan Department of Environmental Quality (MDEQ), Air Quality Division 30 days after the end of the quarter.

In addition, past monitoring requirements have required stack testing to confirm that the particulate emissions were below emission limitations. Stack testing has been completed on all three units and all units were in compliance.

2.0 Monitoring

Monitoring of the ESPs is the primary means of compliance assurance. As mentioned above, the regulatory requirements require continuous monitoring of opacity (visual emissions) which provides an excellent source of data for tracking trends and monitoring the ESPs compliance.

2.1 Indicators

Opacity is the means and the indicator of compliance, efficiency, and effectiveness of the ESP. Opacity is the chosen indicator parameter because it is indicative of the operation of the ESP. When the ESP is functioning properly and the plant systems are in normal operation, the opacity is generally less than 12%, as viewed over 24 hours. If the opacity increases above 12% consistently over 24 hours, or above 20% over 2 hours, it generally indicates a problem or malfunction with the ESP. The 12% opacity threshold is based on plant and operational experience.

Occasional “spikes” of opacity above 12% for a 6-min average or a short series of 6-min averages may or may not indicate a problem or malfunction of the ESP. These spikes are generally related to a specific process occurrence, such as manual rapping, soot blowing, ash handling trouble, boiler upset, or boiler start up or shut down.

Opacity was also chosen as the indicator parameter because of its relationship to particulate emissions. Since particulate emissions have a specified limitation within the air permit the relationship between opacity and particulate emissions is significant. In general, with the exception of small particulate (PM < 2.5), the opacity is reflective of the particulate emissions. In other words, if the opacity is increased, particulate emissions have usually increased and vice-versa.

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Opacity is also monitored on a continuous basis, while other parameters may require extensive stack testing to provide sufficient data for assuring compliance. Continuous monitoring provides up to the minute compliance monitoring and assurance.

2.2 Measures

As mentioned above, generally, if the plant is operating under normal conditions and opacity is less than 12%, as viewed over 24 hours, the ESP is functioning within the normal operating range. Typical values for opacity range from 0 to 12% under normal operating conditions, but can vary greatly based on the unit and operating conditions. Opacity data is increased (>12%) during boiler upset, precipitator field maintenance, soot blowing, and other system malfunctions. The increased opacity situations typically do not occur on a daily basis, but they will occur throughout the plant's operation.

As part of this Compliance Assurance and Monitoring Plan, opacity, the indicator parameter will be the measure of compliance and monitoring for the ESPs. The 12% (long-term) and 20% (short-term) thresholds, which have been established, will be the triggers, which initiate an investigation or inquiry into the performance of the ESP or plant equipment. As a method of compliance assurance, when the opacity exceeds 12% (24-hour) or 20% (2-hour) plant personnel will attempt to determine the reason for the elevated opacity levels. If corrective action is required, and the elevated opacity is not a result of a specified operating condition, the corrective action will be completed as expeditiously as practicable. All corrective action taken will be recorded in the plant's work order computer system.

Opacity measures in exceedance of the air permit limitations are reported to the MDEQ, Air Quality Division.

2.3 Performance Data, Representative Data, & Quality Assurance and Quality Control (QA/QC)

The importance of accurate representative data collection is important if compliance monitoring assurance is based on that data and the method in which it is collected. If the data is invalid or significantly biased the data collected will not provide a good representation of the ESPs' functionality.

Opacity is measured after the ESP and before the Induced Draft Fan in the exhaust ductwork for Units 3 and 5; and after the Induced Draft Fan in the exhaust stack for Unit 4. The opacity is measured by a Monitor Labs Lighthawk 560-DI Visible Emission Monitoring System. The Lighthawk 560-DI is a precision electro-optical instrument known as a "transmissometer", which measures the attenuation of a light beam transmitted through the exhaust gas. Particles in the gas stream cause the light beam to be scattered and absorbed as a function of the type and size of the particles and the wavelength of the impinging light rays. A passive reflector on the opposite side of the exhaust ductwork returns the beam again through the ductwork to a photocell detector on the source side, where it is measured. The measurement value is compared with a reference value previously determined with no "smoke" in the light path and the resulting ratio is an optical transmittance value for the measurement path. The ratio is converted to units of optical density and stack gas opacity.

QA/QC calibrations are conducted on a daily basis. The calibration ensures that the data collected is accurate and representative. Early mornings and after every unit startup a calibration is run which compares the instrument reading to zero opacity and a known span opacity. The allowable error in the instrument is 4%, but the manufacturer's specification is 2% maximum opacity. If the calibration should fail, the operators call in an Instrument and Controls Technician, who will re-zero and re-span the instrument in an effort to recalibrate the instrument. If this step does not resolve the problem, the technician continues to troubleshoot until the problem is corrected.

In addition, the manufacturer's maintenance recommendations are followed, and documented in a recurring Work Order. A computerized log of all repairs both scheduled and unscheduled is kept to track trends in equipment malfunctions and failures.

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2.4 Monitoring Frequency

Opacity monitoring is collected on a continuous basis with 6-minute averages reported. The 6-minute average is a suitable means of recording opacity and assuring compliance because trends or problems that occur in opacity data are very discernible. On a daily basis the Environmental Regulatory Specialist or the Operations Supervisor reviews the previous day's record; all suspect data, trends, missing data are reviewed, questioned, and evaluated.

It is also the practice of the JDY plant to provide current opacity data to the operator's station. If opacity changes significantly and exceeds a specified level (20%) over a 6-minute average, an alarm sounds for the operators. The operators are then required to answer the alarm from a selection of available answers. This method of operator interface and real time continuous monitoring quickly alerts plant staff if changes in the ESPs' performance occur suddenly. Additional alarming signals for the ESP and opacity are available at the operator's station and are discussed in greater detail in Section 3.2.

All opacity data and alarm responses are submitted to the MDEQ, Air Quality Division on a quarterly basis. An example of the daily opacity record is attached in CAM Attachment A.

3.0 Maintenance and Operations

In addition to the scheduled preventative maintenance that occurs on the Lighthawk 560-DI visual emission monitors, a maintenance and operation program is also in place for the ESPs.

3.1 Work Orders and Reoccurring Work Orders

As mentioned above, the JDY plant has a computerized system for placing, tracking and reviewing work orders. This system allows for a continuous record of every repair or maintenance activity that has taken place since the units were installed. This provides an excellent means of compliance assurance because often the past is indicative of the future. Problems are often foreseen before they occur with the ability to track past history.

Another aspect of the work order system is the ability to initiate reoccurring work orders. A reoccurring work order will be displayed at set time intervals. This type of work order is often used in preventative maintenance activities. For example, a reoccurring work order that exists for Unit 4 ESP specifies that drives, rods, boots and electrical mechanics be checked on a bi-weekly basis. The computer system will display this work order on a bi-weekly basis so that the Maintenance Planner can coordinate this activity. Reoccurring work orders are an excellent means of assuring compliance through a comprehensive preventative maintenance program.

3.2 Operations

The operators of the plant are an additional means of assuring compliance. Operators are trained to make visual checks of the opacity, viewed from the outside looking at the stack. In this situation the operators are not certified observers, but because of their plant experience they can note visual difference from one time period to another. This type of check system assures compliance should a monitoring system or communication system fail. (See "Opacity Monitor Downtime – Visual Monitoring", Procedure EP-222, referenced in CAM Attachment A).

Operators are also required on a weekly basis to view the ESP control panel within the precipitator. A checklist is then completed noting field volts, kilovolts, amps, millamps, spark rate and rapping sequence. If the operator notes that the field and emitting rappers are not performing in sequence, he immediately enters a work order to investigate the cause. The field volts, kilovolts, amps, millamps and spark rate are recorded as found, and forwarded to the Operations Supervisor. He evaluates the readings for any

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unusually low or high numbers, and compares the current readings to past readings to note any upwards or downward trends. If any of these observations are made, he enters a work order to investigate the cause.

This checklist is then used to confirm that the ESP is operating within the normal range, to observe malfunctions, and to track trends that occur in the operating parameters. The sample checklist is attached in Appendix A.

As mentioned above, there are additional alarms available to the operators that allow them to track the opacity and operation of the ESPs. Mentioned previously was the alarm signal that notified operators if the opacity exceeded 20% on a six-minute average. In addition to this alarm, an alarm signal notifies the operator whenever the opacity exceeds 20%, no averaging. This alerts the operator to a possible problem quicker than the six-minute average alarm because the alarm is immediate and there is no averaging.

Additionally, alarm signals exist for the following items:

Table 3 – Additional Alarm Signals Available to the Operators

Alarm	Description
Rapper Control	Indicates whether the ESP plates are being rapped in sequence and if there is any problems with the mechanism
General Operation (On or Off)	Indicates if the ESP is in the on or off position.
Transformer Operation	Indicates if the ESP transformers are operating
General Alarm	Indicates a problem with the ESP. Tied to several alarm signals so plant personnel must determine exact problem.

It is transparent that the operators play an important role in compliance assurance, because they usually receive the first feedback in opacity or from the ESP in the form of an alarm.

4.0 Summary

This Compliance Assurance and Monitoring plan for the Electrostatic Precipitators (ESPs) has been developed as a means of assuring compliance at the James De Young Generating Station. All of the procedures and policies specified within this plan are currently in place. The Holland Board of Public Works, James De Young Plant continues to assure compliance through a dedicated effort on the part of plant resources and staff.

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CAM Attachment A

(Available at facility)

Sample Daily Opacity Record

Precipitator Weekly Log
Procedures

- EP-014 Opacity Excess Emissions Quarterly Report
- EP-022 Opacity Exceedance Notification and Reporting
- EP-023 Opacity Monitor Bench Calibration Procedure
- EP-209 Opacity Monitor Performance Audit Procedure
- EP-222 Opacity Monitor Downtime – Visual Monitoring

1-3.5 Fuel Sulfur Monitoring

Permittee shall implement the "SO₂ COMPLIANCE/MONITORING PLAN, #EP-121," dated June 15, 1999 or a subsequent revision approved by the AQD. The goal of the plan is to ensure that only coals or coal blends that are individually compliant with the sulfur limitations of Rule 401 (R336.1401) will be accepted for use on-site. PART I – Sampling and Analysis describes methods to be used in determining if a shipment of coal is individually compliant with the sulfur limitations of Rule 401 (R336.1401). Each sample shall be analyzed for percent moisture, ash, volatiles, fixed carbon, sulfur and heat value.

Records shall be maintained for at least five years.

1-3.6 Continuous Emissions Monitoring System (Title IV)

The CEMS performance specifications defined in 40 CFR Part 75, Appendix B are adopted.

Methods of measurement, frequency of measurement and recordkeeping methods for CEMS required under 40 CFR 75 are outlined in the most recent version of the facility's Acid Rain Program.

Data Reporting: The AQD may approve alternative data reporting or reduction procedures if it can be demonstrated that such procedures are at least as accurate as the procedures identified in R 336.2175.

Appendix 1-4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

Appendix 1-5. Testing Procedures

Specific testing requirement plans, procedures, and averaging times are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, this appendix is not applicable.

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Appendix 1-6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. 199600223.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
342-00	Natural gas startup capability for Unit 3.	EU-UNIT-3

Appendix 1-7. Emission Calculations

Specific emission calculations to be used with monitoring, testing or recordkeeping data are detailed in the appropriate Source-Wide, Emission Unit and/or Flexible group Special Conditions. Therefore, this appendix is not applicable.

Appendix 1-8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.

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Appendix 1-9. Acid Rain Permit



Michigan Department Of Environmental Quality
 Air Quality Division

PHASE II ACID RAIN PERMIT Permit No. MI-AR-1830-2006

Permittee	Holland Board of Public Works – James De Young Generating Facility
Address	64 Pine Avenue, Holland, Michigan
SRN	B2357
ORIS code	1830
Issue Date	October 10, 2006
Effective:	Issuance date of this facility's Renewable Operating Permit at the facility in accordance with 40 CFR 72.73.
Expiration	This permit shall expire when the facility's Renewable Operating Permit expires, in accordance with 40 CFR 72.73.
ROP No.	MI-ROP-B2357-2006

The Acid Rain Permit Contents

1. A statement of basis prepared by the Air Quality Division (AQD) containing:

References to statutory and regulatory authorities, and with comments, notes, and justification that apply to the source in general;
2. Terms and conditions including:

A table of sulfur dioxide allowances to be allocated during the term of the permit, if applicable, authorized by this permit during Phase II. Unless they are subject to sections 405(g)(2) or (3) of the Clean Air Act, new units are not allocated allowances in 40 CFR part 73 and must obtain allowances by other means (sec. 403(e) of the Clean Air Act).;

Comments, notes and justifications regarding permit decisions and changes made to the permit application forms during the review process, and any additional requirements; and,

Any applicable nitrogen oxides compliance plan. Unless they are coal-fired utility units regulated pursuant to sections 404, 405, or 409 of the Clean Air Act, new units are not subject to the acid rain nitrogen oxides requirements [40 CFR 76.1(a)].
3. The permit application that this source submitted, as corrected by the AQD. The owners and operators of the source must comply with the standard requirements and special provisions set forth in the application.

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Statement of Basis

Statutory and Regulatory Authorities.

In accordance with the Natural Resources and Environmental Protection Act, 1994 PA 451 and Titles IV and V of the Clean Air Act, the Michigan Department of Environmental Quality, Air Quality Division (AQD), issues this permit pursuant to the provisions of R 336.1210 to R 336.1218, and R 336.1299(d).

For further information contact:

Brian Carley
Environmental Quality Specialist
Michigan Department of Environmental Quality
Air Quality Division
301 Louis Glick Highway
Jackson, Michigan 49201
Telephone: (517) 780-7843
Facsimile: (517) 780-7437

There are no comments, notes and/or justification that apply to the source in general for this section.

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Terms and Conditions:

Phase II Sulfur Dioxide Allowance Allocation and Nitrogen Oxides Requirements for each affected unit.

		2006	2007	2008	2009	2010
	SO ₂ allowances	1048	1048	1048	1048	1050
Unit 5	NOx Limits	Pursuant to 40 CFR part 76, the State of Michigan Department of Environmental Quality, Air Quality Division approves a NOx standard emissions limitation compliance plan for unit 5. The NOx compliance plan is effective beginning 2006 through 2010. Under the NOx compliance plan, this unit's annual average NOx emissions rate for each year, determined in accordance with 40 CFR part 75, shall not exceed the applicable emission limitation, under 40 CFR 76.7(a)(2), of 0.46 lb/mmBtu for dry bottom wall-fired boilers. In addition to the described NOx compliance plan, this unit shall comply with all other applicable requirements of 40 CFR part 76, including the duty to reapply for a NOx compliance plan and requirements covering excess emissions.				

Comments, notes and justifications regarding permit decisions, and changes made to the permit application forms during the review process: None.

Permit Application: (attached)

*Acid Rain Permit Application Permit submitted June 4, 2004
 Phase II NOx Compliance Plan submitted June 4, 2004*

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**United States
Environmental Protection Agency
Acid Rain Program**

OMB No. 2060-0258

Acid Rain Permit Application

For more information, see instructions and refer to 40 CFR 72.30 and 72.31.

This submission is: New Revised

STEP 1

Identify the source by plant name, State, and ORIS code.

Plant Name James De Young State MI ORIS Code 1830

STEP 2

Enter the unit ID# for every affected unit at the affected source in column "a." For new units, enter the requested information in columns "c" and "d."

EPA Form 7610-16 (rev. 12-03)

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Plant Name (from Step 1) James De Young
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STEP 3

Read the standard requirements

Permit Requirements

- (1) The designated representative of each affected source and each affected unit at the source shall:
 - (i) Submit a complete Acid Rain permit application (including a compliance plan) under 40 CFR part 72 in accordance with the deadlines specified in 40 CFR 72.30; and
 - (ii) Submit in a timely manner any supplemental information that the permitting authority determines is necessary in order to review an Acid Rain permit application and issue or deny an Acid Rain permit;
- (2) The owners and operators of each affected source and each affected unit at the source shall:
 - (i) Operate the unit in compliance with a complete Acid Rain permit application or a superseding Acid Rain permit issued by the permitting authority; and
 - (ii) Have an Acid Rain Permit.

Monitoring Requirements

- (1) The owners and operators and, to the extent applicable, designated representative of each affected source and each affected unit at the source shall comply with the monitoring requirements as provided in 40 CFR part 75.
- (2) The emissions measurements recorded and reported in accordance with 40 CFR part 75 shall be used to determine compliance by the unit with the Acid Rain emissions limitations and emissions reduction requirements for sulfur dioxide and nitrogen oxides under the Acid Rain Program.
- (3) The requirements of 40 CFR part 75 shall not affect the responsibility of the owners and operators to monitor emissions of other pollutants or other emissions characteristics at the unit under other applicable requirements of the Act and other provisions of the operating permit for the source.

Sulfur Dioxide Requirements

- (1) The owners and operators of each source and each affected unit at the source shall:
 - (i) Hold allowances, as of the allowance transfer deadline, in the unit's compliance subaccount (after deductions under 40 CFR 73.34(c)), or in the compliance subaccount of another affected unit at the same source to the extent provided in 40 CFR 73.35(b)(3), not less than the total annual emissions of sulfur dioxide for the previous calendar year from the unit; and
 - (ii) Comply with the applicable Acid Rain emissions limitations for sulfur dioxide.
- (2) Each ton of sulfur dioxide emitted in excess of the Acid Rain emissions limitations for sulfur dioxide shall constitute a separate violation of the Act.
- (3) An affected unit shall be subject to the requirements under paragraph (1) of the sulfur dioxide requirements as follows:
 - (i) Starting January 1, 2000, an affected unit under 40 CFR 72.6(a)(2); or
 - (ii) Starting on the later of January 1, 2000 or the deadline for monitor certification under 40 CFR part 75, an affected unit under 40 CFR 72.6(a)(3).
- (4) Allowances shall be held in, deducted from, or transferred among Allowance Tracking System accounts in accordance with the Acid Rain Program.
- (5) An allowance shall not be deducted in order to comply with the requirements under paragraph (1) of the sulfur dioxide requirements prior to the calendar year for which the allowance was allocated.
- (6) An allowance allocated by the Administrator under the Acid Rain Program is a limited authorization to emit sulfur dioxide in accordance with the Acid Rain Program. No provision of the Acid Rain Program, the Acid Rain permit application, the Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.
- (7) An allowance allocated by the Administrator under the Acid Rain Program does not constitute a property right.

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STEP 3,
 Cont'd.

Nitrogen Oxides Requirements The owners and operators of the source and each affected unit at the source shall comply with the applicable Acid Rain emissions limitation for nitrogen oxides.

Excess Emissions Requirements

- (1) The designated representative of an affected unit that has excess emissions in any calendar year shall submit a proposed offset plan, as required under 40 CFR part 77.
- (2) The owners and operators of an affected unit that has excess emissions in any calendar year shall:
 - (i) Pay without demand the penalty required, and pay upon demand the interest on that penalty, as required by 40 CFR part 77; and
 - (ii) Comply with the terms of an approved offset plan, as required by 40 CFR part 77.

Recordkeeping and Reporting Requirements

- (1) Unless otherwise provided, the owners and operators of the source and each affected unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the Administrator or permitting authority:
 - (i) The certificate of representation for the designated representative for the source and each affected unit at the source and all documents that demonstrate the truth of the statements in the certificate of representation, in accordance with 40 CFR 72.24; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new certificate of representation changing the designated representative;
 - (ii) All emissions monitoring information, in accordance with 40 CFR part 75, provided that to the extent that 40 CFR part 75 provides for a 3-year period for recordkeeping, the 3-year period shall apply.
 - (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the Acid Rain Program; and,
 - (iv) Copies of all documents used to complete an Acid Rain permit application and any other submission under the Acid Rain Program or to demonstrate compliance with the requirements of the Acid Rain Program.
- (2) The designated representative of an affected source and each affected unit at the source shall submit the reports and compliance certifications required under the Acid Rain Program, including those under 40 CFR part 72 subpart I and 40 CFR part 75.

Liability

- (1) Any person who knowingly violates any requirement or prohibition of the Acid Rain Program, a complete Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8, including any requirement for the payment of any penalty owed to the United States, shall be subject to enforcement pursuant to section 113(c) of the Act.
- (2) Any person who knowingly makes a false, material statement in any record, submission, or report under the Acid Rain Program shall be subject to criminal enforcement pursuant to section 113(c) of the Act and 18 U.S.C. 1001.
- (3) No permit revision shall excuse any violation of the requirements of the Acid Rain Program that occurs prior to the date that the revision takes effect.
- (4) Each affected source and each affected unit shall meet the requirements of the Acid Rain Program.

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Plant Name (from Step 1)	James De Young
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Step 3,
Cont'd.Liability, Cont'd.

- (5) Any provision of the Acid Rain Program that applies to an affected source (including a provision applicable to the designated representative of an affected source) shall also apply to the owners and operators of such source and of the affected units at the source.
- (6) Any provision of the Acid Rain Program that applies to an affected unit (including a provision applicable to the designated representative of an affected unit) shall also apply to the owners and operators of such unit. Except as provided under 40 CFR 72.44 (Phase II repowering extension plans) and 40 CFR 76.11 (NO_x averaging plans), and except with regard to the requirements applicable to units with a common stack under 40 CFR part 75 (including 40 CFR 75.16, 75.17, and 75.18), the owners and operators and the designated representative of one affected unit shall not be liable for any violation by any other affected unit of which they are not owners or operators or the designated representative and that is located at a source of which they are not owners or operators or the designated representative.
- (7) Each violation of a provision of 40 CFR parts 72, 73, 74, 75, 76, 77, and 78 by an affected source or affected unit, or by an owner or operator or designated representative of such source or unit, shall be a separate violation of the Act.

Effect on Other Authorities

No provision of the Acid Rain Program, an Acid Rain permit application, an Acid Rain permit, or an exemption under 40 CFR 72.7 or 72.8 shall be construed as:

- (1) Except as expressly provided in title IV of the Act, exempting or excluding the owners and operators and, to the extent applicable, the designated representative of an affected source or affected unit from compliance with any other provision of the Act, including the provisions of title I of the Act relating to applicable National Ambient Air Quality Standards or State Implementation Plans;
- (2) Limiting the number of allowances a unit can hold; *provided*, that the number of allowances held by the unit shall not affect the source's obligation to comply with any other provisions of the Act;
- (3) Requiring a change of any kind in any State law regulating electric utility rates and charges, affecting any State law regarding such State regulation, or limiting such State regulation, including any prudence review requirements under such State law;
- (4) Modifying the Federal Power Act or affecting the authority of the Federal Energy Regulatory Commission under the Federal Power Act; or,
- (5) Interfering with or impairing any program for competitive bidding for power supply in a State in which such program is established.

STEP 4

Read the certification statement, sign, and date

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	David G. Koster
Signature	
Date	5-26-2004

EPA Form 7610-16 (rev. 12-03)

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United States
 Environmental Protection Agency
 Acid Rain Program

OMB No. 2060-0258

Phase II NO_x Compliance Plan

Page 1 of 2

For more information, see instructions and refer to 40 CFR 76.9

This submission is: New Revised

STEP 1
 Indicate plant name,
 State, and ORIS code
 from NADB, if applicable

Plant Name	James De Young	State MI	01830 ORIS Code
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STEP 2

Identify each affected Group 1 and Group 2 boiler using the boiler ID# from NADB, if applicable. Indicate boiler type: "CB" for cell burner, "CY" for cyclone, "DBW" for dry bottom wall-fired, "T" for tangentially fired, "V" for vertically fired, and "WB" for wet bottom. Indicate the compliance option selected for each unit.

| ID# | 5 | ID# | Type |
|------|-----|------|------|------|------|------|------|------|------|------|------|
| Type | DBW | Type | |

(a) Standard annual average emission limitation of 0.50 lb/mmBtu (for Phase I dry bottom wall-fired boilers)

<input type="checkbox"/>					
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(b) Standard annual average emission limitation of 0.45 lb/mmBtu (for Phase I tangentially fired boilers)

<input type="checkbox"/>					
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(c) EPA-approved early election plan under 40 CFR 76.8 through 12/31/07 (also indicate above emission limit specified in plan)

<input type="checkbox"/>					
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(d) Standard annual average emission limitation of 0.46 lb/mmBtu (for Phase II dry bottom wall-fired boilers)

<input checked="" type="checkbox"/>	<input type="checkbox"/>				
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(e) Standard annual average emission limitation of 0.40 lb/mmBtu (for Phase II tangentially fired boilers)

<input type="checkbox"/>					
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(f) Standard annual average emission limitation of 0.68 lb/mmBtu (for cell burner boilers)

<input type="checkbox"/>					
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(g) Standard annual average emission limitation of 0.88 lb/mmBtu (for cyclone boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(h) Standard annual average emission limitation of 0.80 lb/mmBtu (for vertically fired boilers)

<input type="checkbox"/>					
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(i) Standard annual average emission limitation of 0.84 lb/mmBtu (for wet bottom boilers)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(j) NO_x Averaging Plan (include NO_x Averaging form)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(k) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(A) (check the standard emission limitation box above for most stringent limitation applicable to any unit utilizing stack)

<input type="checkbox"/>					
--------------------------	--------------------------	--------------------------	--------------------------	--------------------------	--------------------------

(l) Common stack pursuant to 40 CFR 75.17(a)(2)(i)(B) with NO_x Averaging (check the NO_x Averaging Plan box and include NO_x Averaging form)

<input type="checkbox"/>					
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EPA Form 7610-28 (12-03)

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Plant Name (from Step 1)		James De Young			
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NO_x Compliance - Page 2
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STEP 2, cont'd.

ID# 5	ID#	ID#	ID#	ID#	ID#
Type DBW	Type	Type	Type	Type	Type

- (m) EPA-approved common stack apportionment method pursuant to 40 CFR 75.17 (a)(2)(i)(C), (a)(2)(iii)(B), or (b)(2)
- (n) AEL (include Phase II AEL Demonstration Period, Final AEL Petition, or AEL Renewal form as appropriate)
- (o) Petition for AEL demonstration period or final AEL under review by U.S. EPA or demonstration period ongoing
- (p) Repowering extension plan approved or under review
- | | | | | | |
|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |
| <input type="checkbox"/> |

STEP 3
Read the standard requirements and certification, enter the name of the designated representative, sign &

Standard Requirements

General. This source is subject to the standard requirements in 40 CFR 72.9 (consistent with 40 CFR 76.8(e)(1)(i)). These requirements are listed in this source's Acid Rain Permit.

Special Provisions for Early Election Units

Nitrogen Oxides. A unit that is governed by an approved early election plan shall be subject to an emissions limitation for NO_x as provided under 40 CFR 76.8(a)(2) except as provided under 40 CFR 76.8(e)(3)(ii). **Liability.** The owners and operators of a unit governed by an approved early election plan shall be liable for any violation of the plan or 40 CFR 76.8 at that unit. The owners and operators shall be liable, beginning January 1, 2000, for fulfilling the obligations specified in 40 CFR Part 77. **Termination.** An approved early election plan shall be in effect only until the earlier of January 1, 2008 or January 1 of the calendar year for which a termination of the plan takes effect. If the designated representative of the unit under an approved early election plan fails to demonstrate compliance with the applicable emissions limitation under 40 CFR 76.5 for any year during the period beginning January 1 of the first year the early election takes effect and ending December 31, 2007, the permitting authority will terminate the plan. The termination will take effect beginning January 1 of the year after the year for which there is a failure to demonstrate compliance, and the designated representative may not submit a new early election plan. The designated representative of the unit under an approved early election plan may terminate the plan any year prior to 2008 but may not submit a new early election plan. In order to terminate the plan, the designated representative must submit a notice under 40 CFR 72.40(d) by January 1 of the year for which the termination is to take effect. If an early election plan is terminated any year prior to 2000, the unit shall meet, beginning January 1, 2000, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7. If an early election plan is terminated on or after 2000, the unit shall meet, beginning on the effective date of the termination, the applicable emissions limitation for NO_x for Phase II units with Group 1 boilers under 40 CFR 76.7.

Certification

I am authorized to make this submission on behalf of the owners and operators of the affected source or affected units for which the submission is made. I certify under penalty of law that I have personally examined, and am familiar with, the statements and information submitted in this document and all its attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are to the best of my knowledge and belief true, accurate, and complete. I am aware that there are significant penalties for submitting false statements and information or omitting required statements and information, including the possibility of fine or imprisonment.

Name	David G. Koster
Signature	
Date	5-26-2004

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Appendix 1-10. NOx Budget Trading Permit



Michigan Department Of Environmental Quality
 Air Quality Division

Nitrogen Oxide Budget Permit Permit No. MI-NOX-1830-2006

Permittee	Holland Board of Public Works – James De Young Generating Station
Address	64 Pine Avenue, Holland, Michigan
SRN	B2357
ORIS code	1830
Issue Date	October 10, 2006
Expiration	This permit shall expire when the facility's Renewable Operating Permit expires in accordance with Air Pollution Control Rule 336.1808.
ROP No.	MI-ROP-B2357-2006

This permit incorporates automatically the definitions of terms under Air Pollution Control Rule 336.1803.

This permit incorporates automatically, upon recordation by the EPA Administrator in accordance with Air Pollution Control Rule 336.1812 and 336.1814 every allocation, transfer, or deduction of a NOx allowance to or from the compliance accounts of the NOx Budget units covered by the permit or the overdraft account of the NOx Budget source covered by this permit

The owners and operators of the source must comply with the standard requirements and special provisions set forth in this permit.

This permit incorporates any attached comments, notes or justifications regarding permit decisions and changes made to the permit application forms during the review process.

Units covered under this permit

AQD Unit ID	Unit Type			
5	<input checked="" type="checkbox"/> Stationary Boiler	<input type="checkbox"/> Combined Cycle System	<input type="checkbox"/> Combustion Turbine	<input type="checkbox"/> Other

Permit Application:

NOx Budget Permit Application submitted May 26, 2004

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Standard Requirements

(a) Permit Requirements

(1) The NOx authorized account representative of each NOx Budget source required to have a federally enforceable permit and each NOx Budget unit required to have a federally enforceable permit at the source and subject to R 336.1802 shall:

- (i) Submit to the Michigan Department Of Environmental Quality, Air Quality Division (MDEQ-AQD) a complete NOx Budget permit application pursuant to R 336.1808, in accordance with the deadlines specified in R 336.1808(a), (b), and (c);
- (ii) Submit in a timely manner any supplemental information that the MDEQ-AQD determines is necessary in order to review a NOx Budget permit application and issue or deny a NOx Budget permit.

(2) The owners and operators of each NOx Budget source required to have a federally enforceable permit and each NOx Budget unit required to have a federally enforceable permit at the source shall have a NOx Budget permit issued by the MDEQ-AQD and operate the unit in compliance with such NOx Budget permit.

(b) Monitoring requirements

(1) The owners and operators and, to the extent applicable, the NOx authorized account representative of each NOx Budget source and each NOx Budget unit at the source shall comply with the monitoring requirements of R 336.1813.

(2) The emissions measurements recorded and reported in accordance with R 336.1813 shall be used to determine compliance by the unit with the NOx Budget emissions limitation pursuant to R 333.1810.

(c) Nitrogen oxides requirements

(1) The owners and operators of each NOx Budget source and each NOx Budget unit at the source shall hold NOx allowances available for compliance deductions pursuant to R 336.1810 and R 336.1811 in the unit's compliance account and the source's overdraft account in an amount not less than the total NOx emissions for the control period from the unit; plus any amount necessary to account for actual heat input for the control period or to account for excess emissions for a prior control period; or to account for withdrawal from the NOx Budget Trading Program, or a change in regulatory status, of a NOx Budget opt-in unit.

(2) Each ton of nitrogen oxides emitted in excess of the NOx Budget emissions limitation shall constitute a separate violation of 40 CFR part 96, the Clean Air Act, and R 336.1810 or R 336.1811 (applicable State law).

(3) A NOx Budget unit shall be subject to the requirements under paragraph (c)(1) starting on the later of May 1, 2003 or the date on which the unit commences operation.

(4) NOx allowances shall be held in, deducted from, or transferred among NOx Allowance Tracking System accounts in accordance with R 336.1810 and R 336.1811.

(5) A NOx allowance shall not be deducted, in order to comply with the requirements under paragraph (c)(1), for a control period in a year prior to the year for which the NOx allowance was allocated.

(6) A NOx allowance allocated by the Administrator under the NOx Budget Trading Program is a limited authorization to emit one ton of nitrogen oxides in accordance with the NOx Budget Trading Program. No provision of the NOx Budget Trading Program, the NOx Budget permit application, the NOx Budget permit, or an exemption pursuant to R 336.1802 and no provision of law shall be construed to limit the authority of the United States to terminate or limit such authorization.

(7) A NOx allowance allocated by the Administrator under the NOx Budget Trading Program does not constitute a property right.

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(8) Upon recordation by the Administrator under subpart F or G of 40 CFR part 96, every allocation, transfer, or deduction of a NOx allowance to or from a NOx Budget unit's compliance account or the overdraft account of the source where the unit is located is incorporated automatically in any NOx Budget permit of the NOx Budget unit.

(d) Excess emissions requirements

(1) The owners and operators of a NOx Budget unit that has excess emissions in any control period shall:

- (i) Surrender the NOx allowances required for deduction pursuant to R 336.1810 or R 336.1811; and
- (ii) Pay any fine, penalty, or assessment or comply with any other remedy imposed therein.

(e) Recordkeeping and Reporting Requirements

(1) Unless otherwise provided, the owners and operators of the NOx Budget source and each NOx Budget unit at the source shall keep on site at the source each of the following documents for a period of 5 years from the date the document is created. This period may be extended for cause, at any time prior to the end of 5 years, in writing by the MDEQ-AQD or the Administrator.

- (i) The account certificate of representation, pursuant to R 336.1807 for the NOx authorized account representative for the source and each NOx Budget unit at the source and all documents that demonstrate the truth of the statements in the account certificate of representation; provided that the certificate and documents shall be retained on site at the source beyond such 5-year period until such documents are superseded because of the submission of a new account certificate of representation, pursuant to R 336.1807 changing the NOx authorized account representative.
- (ii) All emissions monitoring information, in accordance with R 336.1813
- (iii) Copies of all reports, compliance certifications, and other submissions and all records made or required under the NOx Budget Trading Program.
- (iv) Copies of all documents used to complete a NOx Budget permit application and any other submission under the NOx Budget Trading Program or to demonstrate compliance with the requirements of the NOx Budget Trading Program.

(2) The NOx authorized account representative of a NOx Budget source and each NOx Budget unit at the source shall submit the reports and compliance certifications required under the NOx Budget Trading Program, pursuant to R 336.1807, R 336.1809 and R 336.1813.

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(f) Liability.

- (1) Any person who knowingly violates any requirement or prohibition of the NOx Budget Trading Program, a NOx Budget permit, or an exemption pursuant to R 33.1802, as it would apply to the facility, shall be subject to enforcement pursuant to applicable State or Federal law.
- (2) Any person who knowingly makes a false material statement in any record, submission, or report under the NOx Budget Trading Program shall be subject to criminal enforcement pursuant to the applicable State or Federal law.
- (3) No permit revision shall excuse any violation of the requirements of the NOx Budget Trading Program that occurs prior to the date that the revision takes effect.
- (4) Each NOx Budget source and each NOx Budget unit shall meet the requirements of the NOx Budget Trading Program.
- (5) Any provision of the NOx Budget Trading Program that applies to a NOx Budget source or the NOx authorized account representative of a NOx Budget source shall also apply to the owners and operators of such source and of the NOx Budget units at the source.
- (6) Any provision of the NOx Budget Trading Program that applies to a NOx Budget unit or the NOx authorized account representative of a NOx budget unit shall also apply to the owners and operators of such unit. Except with regard to the requirements applicable to units with a common stacks, the owners and operators and the NOx authorized account representative of one NOx Budget unit shall not be liable for any violation by any other NOx Budget unit of which they are not owners or operators or the NOx authorized account representative and that is located at a source of which they are not owners or operators or the NOx authorized account representative.

(g) Effect on Other Authorities.

No provision of the NOx Budget Trading Program, a NOx Budget permit application, a NOx Budget permit, or an exemption pursuant to R336.1802 shall be construed as exempting or excluding the owners and operators and, to the extent applicable, the NOx authorized account representative of a NOx Budget source or NOx Budget unit from compliance with any other provision of the applicable, approved State implementation plan, a federally enforceable permit, or the Clean Air Act.

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Section 2 – Municipal Wastewater Treatment Plant

Holland Board of Public Works
Section 2
Municipal Wastewater Treatment Plant

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A. GENERAL CONDITIONS

Permit Enforceability

- All conditions in this permit are both federally enforceable and state enforceable unless otherwise noted. (**R 336.1213(5)**)
- Those conditions that are hereby incorporated in a state only enforceable Source-wide PTI pursuant to Rule 201(2)(d) are designated by footnote one. (**R 336.1213(5)(a), R 336.1214a(5)**)
- Those conditions that are hereby incorporated in federally enforceable Source-wide PTI No. MI-PTI-B2357-2006a pursuant to Rule 201(2)(c) are designated by footnote two. (**R 336.1213(5)(b), R 336.1214a(3)**)

General Provisions

1. The permittee shall comply with all conditions of this ROP. Any ROP noncompliance constitutes a violation of Act 451, and is grounds for enforcement action, for ROP revocation or revision, or for denial of the renewal of the ROP. All terms and conditions of this ROP that are designated as federally enforceable are enforceable by the Administrator of the United States Environmental Protection Agency (USEPA) and by citizens under the provisions of the federal Clean Air Act (CAA). Any terms and conditions based on applicable requirements which are designated as "state only" are not enforceable by the USEPA or citizens pursuant to the CAA. (**R 336.1213(1)(a)**)
2. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this ROP. (**R 336.1213(1)(b)**)
3. This ROP may be modified, revised, or revoked for cause. The filing of a request by the permittee for a permit modification, revision, or termination, or a notification of planned changes or anticipated noncompliance does not stay any ROP term or condition. This does not supersede or affect the ability of the permittee to make changes, at the permittee's own risk, pursuant to Rule 215 and Rule 216. (**R 336.1213(1)(c)**)
4. The permittee shall allow the department, or an authorized representative of the department, upon presentation of credentials and other documents as may be required by law and upon stating the authority for and purpose of the investigation, to perform any of the following activities (**R 336.1213(1)(d)**):
 - a. Enter, at reasonable times, a stationary source or other premises where emissions-related activity is conducted or where records must be kept under the conditions of the ROP.
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the ROP.
 - c. Inspect, at reasonable times, any of the following:
 - i. Any stationary source.
 - ii. Any emission unit.
 - iii. Any equipment, including monitoring and air pollution control equipment.
 - iv. Any work practices or operations regulated or required under the ROP.
 - d. As authorized by Section 5526 of Act 451, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the ROP or applicable requirements.
5. The permittee shall furnish to the department, within a reasonable time, any information the department may request, in writing, to determine whether cause exists for modifying, revising, or revoking the ROP or to determine compliance with this ROP. Upon request, the permittee shall also furnish to the department copies of any records that are required to be kept as a term or condition of this ROP. For information which is claimed by the permittee to be confidential, consistent with the requirements of the 1976 PA 442, MCL §15.231 et seq.,

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and known as the Freedom of Information Act, the person may also be required to furnish the records directly to the USEPA together with a claim of confidentiality. **(R 336.1213(1)(e))**

6. A challenge by any person, the Administrator of the USEPA, or the department to a particular condition or a part of this ROP shall not set aside, delay, stay, or in any way affect the applicability or enforceability of any other condition or part of this ROP. **(R 336.1213(1)(f))**
7. The permittee shall pay fees consistent with the fee schedule and requirements pursuant to Section 5522 of Act 451. **(R 336.1213(1)(g))**
8. This ROP does not convey any property rights or any exclusive privilege. **(R 336.1213(1)(h))**

Equipment & Design

9. Any collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
10. Any air cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the Michigan Air Pollution Control rules and existing law. **(R 336.1910)**

Emission Limits

11. Except as provided in Subrules 2, 3, and 4 of Rule 301, states in part; "a person shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of a density greater than the most stringent of Rule 301(1)(a) or (b) unless otherwise specified in this ROP." The grading of visible emissions shall be determined in accordance with Rule 303. **(R 336.1301(1) in pertinent part):**
 - a. A 6-minute average of 20 percent opacity, except for one 6-minute average per hour of not more than 27 percent opacity.
 - b. A limit specified by an applicable federal new source performance standard.
12. The permittee shall not cause or permit the emission of an air contaminant or water vapor in quantities that cause, alone or in reaction with other air contaminants, either of the following:
 - a. Injurious effects to human health or safety, animal life, plant life of significant economic value, or property.¹ **(R 336.1901(a))**
 - b. Unreasonable interference with the comfortable enjoyment of life and property.¹ **(R 336.1901(b))**

Testing/Sampling

13. The department may require the owner or operator of any source of an air contaminant to conduct acceptable performance tests, at the owner's or operator's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001(1). **(R 336.2001)**
14. Any required performance testing shall be conducted in accordance with Rule 1001(2), Rule 1001(3) and Rule 1003. **(R 336.2001(2), R 336.2001(3), R 336.2003(1))**
15. Any required test results shall be submitted to the Air Quality Division (AQD) in the format prescribed by the applicable reference test method within 60 days following the last date of the test. **(R 336.2001(4))**

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Monitoring/Recordkeeping

16. Records of any periodic emission or parametric monitoring required in this ROP shall include the following information specified in Rule 213(3)(b)(i), where appropriate (**R 336.1213(3)(b)**):
 - a. The date, location, time, and method of sampling or measurements.
 - b. The dates the analyses of the samples were performed.
 - c. The company or entity that performed the analyses of the samples.
 - d. The analytical techniques or methods used.
 - e. The results of the analyses.
 - f. The related process operating conditions or parameters that existed at the time of sampling or measurement.
17. All required monitoring data, support information and all reports, including reports of all instances of deviation from permit requirements, shall be kept and furnished to the department upon request for a period of not less than 5 years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings, or other original data records, for continuous monitoring instrumentation and copies of all reports required by the ROP. (**R 336.1213(1)(e), R 336.1213(3)(b)(ii)**)

Certification & Reporting

18. Except for the alternate certification schedule provided in Rule 213(3)(c)(iii)(B), any document required to be submitted to the department as a term or condition of this ROP shall contain an original certification by a responsible official which states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (**R 336.1213(3)(c)**)
19. A responsible official shall certify to the appropriate AQD District Office and to the USEPA that the stationary source is and has been in compliance with all terms and conditions contained in the ROP except for deviations that have been or are being reported to the appropriate AQD District Office pursuant to Rule 213(3)(c). This certification shall include all the information specified in Rule 213(4)(c)(i) through (v) and shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. The USEPA address is: USEPA, Air Compliance Data - Michigan, Air and Radiation Division, 77 West Jackson Boulevard, Chicago, Illinois 60604. (**R 336.1213(4)(c)**)
20. The certification of compliance shall be submitted annually for the term of this ROP as detailed in the special conditions, or more frequently if specified in an applicable requirement or in this ROP. (**R 336.1213(4)(c)**)
21. The permittee shall promptly report any deviations from ROP requirements and certify the reports. The prompt reporting of deviations from ROP requirements is defined in Rule 213(3)(c)(ii) as follows, unless otherwise described in this ROP. (**R 336.1213(3)(c)**)
 - a. For deviations that exceed the emissions allowed under the ROP, prompt reporting means reporting consistent with the requirements of Rule 912 as detailed in Condition 25. All reports submitted pursuant to this paragraph shall be promptly certified as specified in Rule 213(3)(c)(iii).
 - b. For deviations which exceed the emissions allowed under the ROP and which are not reported pursuant to Rule 912 due to the duration of the deviation, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe reasons for each deviation and the actions taken to minimize or correct each deviation.
 - c. For deviations that do not exceed the emissions allowed under the ROP, prompt reporting means the reporting of all deviations in the semiannual reports required by Rule 213(3)(c)(i). The report shall describe the reasons for each deviation and the actions taken to minimize or correct each deviation.

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22. For reports required pursuant to Rule 213(3)(c)(ii), prompt certification of the reports is described in Rule 213(3)(c)(iii) as either of the following **(R 336.1213(3)(c))**:
 - a. Submitting a certification by a responsible official with each report which states that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.
 - b. Submitting, within 30 days following the end of a calendar month during which one or more prompt reports of deviations from the emissions allowed under the ROP were submitted to the department pursuant to Rule 213(3)(c)(ii), a certification by a responsible official which states that, "based on information and belief formed after reasonable inquiry, the statements and information contained in each of the reports submitted during the previous month were true, accurate, and complete". The certification shall include a listing of the reports that are being certified. Any report submitted pursuant to Rule 213(3)(c)(ii) that will be certified on a monthly basis pursuant to this paragraph shall include a statement that certification of the report will be provided within 30 days following the end of the calendar month.
23. Semiannually for the term of the ROP as detailed in the special conditions, or more frequently if specified, the permittee shall submit certified reports of any required monitoring to the appropriate AQD District Office. All instances of deviations from ROP requirements during the reporting period shall be clearly identified in the reports. **(R 336.1213(3)(c)(i))**
24. On an annual basis, the permittee shall report the actual emissions, or the information necessary to determine the actual emissions, of each regulated air pollutant as defined in Rule 212(6) for each emission unit utilizing the emissions inventory forms provided by the department. **(R 336.1212(6))**
25. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the appropriate AQD District Office. The notice shall be provided not later than two business days after the start-up, shutdown, or discovery of the abnormal conditions or malfunction. Notice shall be by any reasonable means, including electronic, telephonic, or oral communication. Written reports, if required under Rule 912, must be submitted to the appropriate AQD District Supervisor within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal conditions or malfunction has been corrected, or within 30 days of discovery of the abnormal conditions or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5) and shall be certified by a responsible official in a manner consistent with the CAA. **(R 336.1912)**

Permit Shield

26. Compliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of ROP issuance, if either of the following provisions is satisfied. **(R 336.1213(6)(a)(i), R 336.1213(6)(a)(ii))**
 - a. The applicable requirements are included and are specifically identified in the ROP.
 - b. The permit includes a determination or concise summary of the determination by the department that other specifically identified requirements are not applicable to the stationary source.

Any requirements identified in Part E of this ROP have been identified as non-applicable to this ROP and are included in the permit shield.
27. Nothing in this ROP shall alter or affect any of the following:
 - a. The provisions of Section 303 of the CAA, emergency orders, including the authority of the USEPA under Section 303 of the CAA. **(R 336.1213(6)(b)(i))**
 - b. The liability of the owner or operator of this source for any violation of applicable requirements prior to or at the time of this ROP issuance. **(R 336.1213(6)(b)(ii))**
 - d. The applicable requirements of the acid rain program, consistent with Section 408(a) of the CAA. **(R 336.1213(6)(b)(iii))**

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- e. The ability of the USEPA to obtain information from a source pursuant to Section 114 of the CAA. **(R 336.1213(6)(b)(iv))**
28. The permit shield shall not apply to provisions incorporated into this ROP through procedures for any of the following:
- a. Operational flexibility changes made pursuant to Rule 215. **(R 336.1215(5))**
 - b. Administrative Amendments made pursuant to Rule 216(1)(a)(i)-(iv). **(R 336.1216(1)(b)(iii))**
 - c. Administrative Amendments made pursuant to Rule 216(1)(a)(v) until the amendment has been approved by the department. **(R 336.1216(1)(c)(iii))**
 - d. Minor Permit Modifications made pursuant to Rule 216(2). **(R 336.1216(2)(f))**
 - e. State-Only Modifications made pursuant to Rule 216(4) until the changes have been approved by the department. **(R 336.1216(4)(e))**
29. Expiration of this ROP results in the loss of the permit shield. If a timely and administratively complete application for renewal is submitted not more than 18 months, but not less than 6 months, before the expiration date of the ROP, but the department fails to take final action before the end of the ROP term, the existing ROP does not expire until the renewal is issued or denied, and the permit shield shall extend beyond the original ROP term until the department takes final action. **(R 336.1217(1)(c), R 336.1217(1)(a))**

Revisions

30. For changes to any process or process equipment covered by this ROP that do not require a revision of the ROP pursuant to Rule 216, the permittee must comply with Rule 215. **(R 336.1215, R 336.1216)**
31. A change in ownership or operational control of a stationary source covered by this ROP shall be made pursuant to Rule 216(1). **(R 336.1219(2))**
32. For revisions to this ROP, an administratively complete application shall be considered timely if it is received by the department in accordance with the time frames specified in Rule 216. **(R 336.1210(9))**
33. Pursuant to Rule 216(1)(b)(iii), Rule 216(2)(d) and Rule 216(4)(d), after a change has been made, and until the department takes final action, the permittee shall comply with both the applicable requirements governing the change and the ROP terms and conditions proposed in the application for the modification. During this time period, the permittee may choose to not comply with the existing ROP terms and conditions that the application seeks to change. However, if the permittee fails to comply with the ROP terms and conditions proposed in the application during this time period, the terms and conditions in the ROP are enforceable. **(R 336.1216(1)(c)(iii), R 336.1216(2)(d), R 336.1216(4)(d))**

Reopenings

34. A ROP shall be reopened by the department prior to the expiration date and revised by the department under any of the following circumstances:
- a. If additional requirements become applicable to this stationary source with three or more years remaining in the term of the ROP, but not if the effective date of the new applicable requirement is later than the ROP expiration date. **(R 336.1217(2)(a)(i))**
 - b. If additional requirements pursuant to Title IV of the CAA become applicable to this stationary source. **(R 336.1217(2)(a)(ii))**
 - c. If the department determines that the ROP contains a material mistake, information required by any applicable requirement was omitted, or inaccurate statements were made in establishing emission limits or the terms or conditions of the ROP. **(R 336.1217(2)(a)(iii))**
 - d. If the department determines that the ROP must be revised to ensure compliance with the applicable requirements. **(R 336.1217(2)(a)(iv))**

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Renewals

35. For renewal of this ROP, an administratively complete application shall be considered timely if it is received by the department not more than 18 months, but not less than 6 months, before the expiration date of the ROP. **(R 336.1210(7))**

Stratospheric Ozone Protection

36. If the permittee is subject to Title 40 of the Code of Federal Regulations (CFR), Part 82 and services, maintains, or repairs appliances except for motor vehicle air conditioners (MVAC), or disposes of appliances containing refrigerant, including MVAC and small appliances, or if the permittee is a refrigerant reclaimer, appliance owner or a manufacturer of appliances or recycling and recovery equipment, the permittee shall comply with all applicable standards for recycling and emissions reduction pursuant to 40 CFR, Part 82, Subpart F.
37. If the permittee is subject to 40 CFR, Part 82, and performs a service on motor (fleet) vehicles when this service involves refrigerant in the MVAC, the permittee is subject to all the applicable requirements as specified in 40 CFR, Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed by the original equipment manufacturer. The term MVAC as used in Subpart B does not include the air-tight sealed refrigeration system used for refrigerated cargo or an air conditioning system on passenger buses using Hydrochlorofluorocarbon-22 refrigerant.

Risk Management Plan

38. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall register and submit to the USEPA the required data related to the risk management plan for reducing the probability of accidental releases of any regulated substances listed pursuant to Section 112(r)(3) of the CAA as amended in 40 CFR, Part 68.130. The list of substances, threshold quantities, and accident prevention regulations promulgated under 40 CFR, Part 68, do not limit in any way the general duty provisions under Section 112(r)(1).
39. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall comply with the requirements of 40 CFR, Part 68, no later than the latest of the following dates as provided in 40 CFR, Part 68.10(a):
- June 21, 1999,
 - Three years after the date on which a regulated substance is first listed under 40 CFR, Part 68.130, or
 - The date on which a regulated substance is first present above a threshold quantity in a process.
40. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall submit any additional relevant information requested by any regulatory agency necessary to ensure compliance with the requirements of 40 CFR, Part 68.
41. If subject to Section 112(r) of the CAA and 40 CFR, Part 68, the permittee shall annually certify compliance with all applicable requirements of Section 112(r) as detailed in Rule 213(4)(c)). **(40 CFR, Part 68)**

Emission Trading

42. Emission averaging and emission reduction credit trading are allowed pursuant to any applicable interstate or regional emission trading program that has been approved by the Administrator of the USEPA as a part of Michigan's State Implementation Plan. Such activities must comply with Rule 215 and Rule 216. **(R 336.1213(12))**

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Permit To Install (PTI)

43. The process or process equipment included in this permit shall not be reconstructed, relocated, or modified unless a PTI authorizing such action is issued by the department, except to the extent such action is exempt from the PTI requirements by any applicable rule.² (**R 336.1201(1)**)
44. The department may, after notice and opportunity for a hearing, revoke PTI terms or conditions if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of the PTI or is violating the department's rules or the CAA.² (**R 336.1201(8), Section 5510 of Act 451**)
45. The terms and conditions of a PTI shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by the PTI. If a new owner or operator submits a written request to the department pursuant to Rule 219 and the department approves the request, this PTI will be amended to reflect the change of ownership or operational control. The request must include all of the information required by Subrules (1)(a), (b) and (c) of Rule 219. The written request shall be sent to the appropriate AQD District Supervisor, MDEQ.² (**R 336.1219**)
46. If the installation, reconstruction, relocation, or modification of the equipment for which PTI terms and conditions have been approved has not commenced within 18 months, or has been interrupted for 18 months, the applicable terms and conditions from that PTI shall become void unless otherwise authorized by the department. Furthermore, the person to whom that PTI was issued, or the designated authorized agent, shall notify the department via the Supervisor, Permit Section, MDEQ, AQD, P. O. Box 30260, Lansing, Michigan 48909, if it is decided not to pursue the installation, reconstruction, relocation, or modification of the equipment allowed by the terms and conditions from that PTI.² (**R 336.1201(4)**)

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

B. SOURCE-WIDE CONDITIONS

Part B outlines the Source-Wide Terms and Conditions that apply to this stationary source. The permittee is subject to these special conditions for the stationary source in addition to the general conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply to this source, NA (not applicable) has been used in the table. If there are no Source-Wide Conditions, this section will be left blank.

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SOURCE-WIDE CONDITIONS

DESCRIPTION

Asbestos NESHAP (40 CFR 61, Subpart M) and report certification requirements.

POLLUTION CONTROL EQUIPMENT

NA

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

NA

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

NA

See Appendix 2-5

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall maintain waste shipment records of all asbestos-containing waste material transported off the facility site in accordance with the provisions of **40 CFR 61.150(d)(1),(2) and (3)**.

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)

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3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**
4. Each responsible official shall certify annually the compliance status of the stationary source with all stationary Source-wide conditions. This certification shall be included as part of the annual certification of compliance as required in the General Conditions in Part A and Rule 213(4)(c). **(R 336.1213(4)(c))**
5. For all renovation of regulated asbestos containing material and demolition required to submit notification under 40 CFR 61.145(a), the permittee shall provide notification to the AQD in accordance with the provisions of **40 CFR 61.145(b)**.
6. With the exception of ordered demolitions, as defined by 40 CFR 61.145(a)(3), the permittee shall provide the notification at least ten working days prior to the onset of any activity that would break up, dislodge or similarly disturb asbestos material. **(40 CFR 61.145 (b))**
7. For ordered demolitions, as defined by **40 CFR 61.145(a)(3)**, the permittee shall provide such notification no later than the following work day after the onset of any activity that would break up, dislodge or similarly disturb asbestos material.
8. The permittee shall provide notification to the AQD for all instances where a waste shipment record, signed by the owner or operator of the designated waste disposal site, is not received by the permittee within 45 days of the date the waste was accepted by the initial transporter, in accordance with the provisions of **40 CFR 61.150(d)(4)**.

See Appendix 2-8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

1. The permittee shall perform renovation of all regulated asbestos containing material (RACM) in accordance with **40 CFR 61.145(c)**, and if applicable, **Appendix A of 40 CFR Part 61, Subpart M**.
2. The permittee shall dispose all RACM in accordance with the provisions of **40 CFR 61.150(a),(b) and (c)**.
3. The permittee shall comply with all applicable portions of **40 CFR Part 61, Subpart M - National Emission Standard for Asbestos** and **40 CFR Part 61, Subpart A - General Provisions**.

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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C. EMISSION UNIT CONDITIONS

Part C outlines terms and conditions that are specific to individual emission units listed in the Emission Unit Summary Table. The permittee is subject to the special conditions for each emission unit in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no conditions specific to individual emission units, this section will be left blank.

EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date/ Modification Date	Flexible Group ID
EU-LIME-BIN	Lime storage bin controlled by a fabric filter.	01-01-1971/ NA	NA
EU-ODOR-SCRUBBER	An oxidizing wet scrubber which controls odors from the following areas of the wastewater treatment plant: four sludge thickeners, sludge press building, north & south headworks, grit building, screen building, primary effluent distribution structure, truck loading operations, sludge holding tank, sludge thickening building and four primary basins.	04-01-1993/ NA	NA
EU-COLD-CLEANER	A maintenance shop cold cleaner.	10-01-1991/ NA	FG-COLD-CLEANERS

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EU-LIME-BIN EMISSION UNIT CONDITIONS

DESCRIPTION

Lime storage bin controlled by a fabric filter.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Bin vent fabric filter

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
1. Particulate Matter	0.10 pound per 1,000 pounds exhaust gas (dry basis) ²	At all times, as verifiable through any requested stack testing	Each baghouse discharge point	S.C. VI.1 (Periodic checks visible emissions; see Appendix 2-3)	R 336.1331(a), Table 31(J)

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not conduct unloading operations into the lime storage bin unless the fabric filter collectors are installed and operating properly. ² (R 336.1910)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (R 336.1213(3)(b)(ii))

1. The permittee shall assess opacity using U.S. EPA Reference Method 9 - "Visual Determination of the Opacity of Emissions from Stationary Sources", upon the request of AQD. (R 336.1213(3))
2. The permittee shall assess particulate matter emissions using U.S. EPA Reference Method 5 – "Determination of Particulate Emissions from Stationary Sources", upon the request of AQD. (R 336.1213(3))

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VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall conduct and record non-certified visual inspections for opacity from the lime storage bin vent filters while it is in operation. These inspections shall be performed during each loading operation. (**R 336.1213(3)**)

See Appendices 2-3

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)

See Appendix 2-8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
NA	NA	NA	NA

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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EU-ODOR-SCRUBBER EMISSION UNIT CONDITIONS

DESCRIPTION

An oxidizing wet scrubber which controls odors from the following areas of the wastewater treatment plant: four sludge thickeners, sludge press building, north & south headworks, grit building, screen building, primary effluent distribution structure, truck loading operations, sludge holding tank, sludge thickening building and four primary basins.

Flexible Group ID: NA

POLLUTION CONTROL EQUIPMENT

Wet scrubber

I. EMISSION LIMIT(S)

Pollutant	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

II. MATERIAL LIMIT(S)

Material	Limit	Time Period/ Operating Scenario	Equipment	Monitoring/ Testing Method	Underlying Applicable Requirements
NA	NA	NA	NA	NA	NA

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall operate the oxidizing wet scrubber as described in the Permit to Install application.² (**R 336.1201(3)**)
2. The permittee shall operate the oxidizing wet scrubber in accordance with the most current version of the Malfunction Abatement Plan, as amended, originally dated August 26, 1993.² (**R 336.1911(4)**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

NA

V. TESTING/SAMPLING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

NA

See Appendix 2-5

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VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. (**R 336.1213(3)(b)(ii)**)

1. The permittee shall monitor and record the liquid flow to the wet oxidizing scrubber on a daily basis.² (**R 336.1213(3)**)

See Appendix 2-3

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. (**R 336.1213(3)(c)(ii)**)
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. (**R 336.1213(3)(c)(i)**)
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. (**R 336.1213(4)(c)**)

See Appendix 2-8

VIII. STACK/VENT RESTRICTION(S)

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

Stack & Vent ID	Maximum Exhaust Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
1. SV-ODOR-SCRUBBER	NA	20.5 ²	R 336.1201(3)

IX. OTHER REQUIREMENT(S)

NA

Footnotes:

¹This condition is state only enforceable and was established pursuant to Rule 201(1)(b).

²This condition is federally enforceable and was established pursuant to Rule 201(1)(a).

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D. FLEXIBLE GROUP CONDITIONS

Part D outlines terms and conditions that apply to more than one emission unit. The permittee is subject to the special conditions for each flexible group in addition to the General Conditions in Part A and any other terms and conditions contained in this ROP.

The permittee shall comply with all specific details in the special conditions and the underlying applicable requirements cited. If a specific condition type does not apply, NA (not applicable) has been used in the table. If there are no special conditions that apply to more than one emission unit, this section will be left blank.

FLEXIBLE GROUP SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Flexible Group ID	Flexible Group Description	Associated Emission Unit IDs
FG-COLD-CLEANERS	Any "new" cold parts cleaner that is exempt from Rule 201 pursuant to Rule 281(h) or Rule 285(r)(iv). "New" cold parts cleaners were placed into operation on or after July 1, 1979. The cleaning units are used in support of facility operations.	EU-COLD-CLEANER

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FG-COLD-CLEANERS FLEXIBLE GROUP CONDITIONS

DESCRIPTION

Any cold cleaner that is grandfathered or exempt from Rule 201 pursuant to Rule 278 and Rule 281(h) or Rule 285(r)(iv). Existing cold cleaners were placed into operation prior to July 1, 1979. New cold cleaners were placed into operation on or after July 1, 1979.

Emission Unit: EU-COLD-CLEANER

I. EMISSION LIMIT(S)

NA

II. MATERIAL LIMIT(S)

1. The permittee shall not use cleaning solvents containing more than five percent by weight of the following halogenated compounds: methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, chloroform, or any combination thereof. (**R 336.1213(2)**)

III. PROCESS/OPERATIONAL RESTRICTION(S)

1. Cleaned parts shall be drained for no less than 15 seconds or until dripping ceases. (**R 336.1611(2)(b), R 336.1707(3)(b)**)
2. The permittee shall perform routine maintenance on each cold cleaner as recommended by the manufacturer. (**R 336.1213(3)**)

IV. DESIGN/EQUIPMENT PARAMETER(S)

1. The cold cleaner must meet one of the following design requirements:
 - a. The air/vapor interface of the cold cleaner is no more than ten square feet. (**R 336.1281(h)**)
 - b. The cold cleaner is used for cleaning metal parts and the emissions are released to the general in-plant environment. (**R 336.1285(r)(iv)**)
2. The cold cleaner shall be equipped with a device for draining cleaned parts. (**R 336.1611(2)(b), R 336.1707(3)(b)**)
3. All new and existing cold cleaners shall be equipped with a cover and the cover shall be closed whenever parts are not being handled in the cold cleaner. (**R 336.1611(2)(a), R 336.1707(3)(a)**)
4. The cover of a new cold cleaner shall be mechanically assisted if the Reid vapor pressure of the solvent is more than 0.3 psia or if the solvent is agitated or heated. (**R 336.1707(3)(a)**)
5. If the Reid vapor pressure of any solvent used in a new cold cleaner is greater than 0.6 psia; or, if any solvent used in a new cold cleaner is heated above 120 degrees Fahrenheit, then the cold cleaner must comply with at least one of the following provisions:
 - a. The cold cleaner must be designed such that the ratio of the freeboard height to the width of the cleaner is equal to or greater than 0.7. (**R 336.1707(2)(a)**)
 - b. The solvent bath must be covered with water if the solvent is insoluble and has a specific gravity of more than 1.0. (**R 336.1707(2)(b)**)

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- c. The cold cleaner must be controlled by a carbon adsorption system, condensation system, or other method of equivalent control approved by the AQD. **(R 336.1707(2)(c))**

V. TESTING/SAMPLING

NA

VI. MONITORING/RECORDKEEPING

Records shall be maintained on file for a period of five years. **(R 336.1213(3)(b)(ii))**

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions. **(R 336.1213(3))**
2. The permittee shall maintain the following information on file for each cold cleaner: **(R 336.1213(3))**
 - a. A serial number, model number, or other unique identifier for each cold cleaner.
 - b. The date the unit was installed, manufactured or that it commenced operation.
 - c. The air/vapor interface area for any unit claimed to be exempt under Rule 281(h).
 - d. The applicable Rule 201 exemption.
 - e. The Reid vapor pressure of each solvent used.
 - f. If applicable, the option chosen to comply with Rule 707(2).
3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner. **(R 336.1611(3), R 336.1707(4))**
4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers. If the waste solvent is a safety hazard and is stored in non-closed containers, verification that the waste solvent is disposed of so that not more than 20 percent, by weight, is allowed to evaporate into the atmosphere shall be made on a monthly basis. **(R 336.1213(3), R 336.1611(2)(c), R 336.1707(3)(c))**

VII. REPORTING

1. Prompt reporting of deviations pursuant to General Conditions 21 and 22 of Part A. **(R 336.1213(3)(c)(ii))**
2. Semiannual reporting of monitoring and deviations pursuant to General Condition 23 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for reporting period July 1 to December 31 and September 15 for reporting period January 1 to June 30. **(R 336.1213(3)(c)(i))**
3. Annual certification of compliance pursuant to General Conditions 19 and 20 of Part A. The report shall be postmarked or received by the appropriate AQD District Office by March 15 for the previous calendar year. **(R 336.1213(4)(c))**

See Appendix 8

VIII. STACK/VENT RESTRICTION(S)

NA

IX. OTHER REQUIREMENT(S)

NA

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E. NON-APPLICABLE REQUIREMENTS

At the time of the ROP issuance, the AQD has determined that no non-applicable requirements have been identified for incorporation into the permit shield provision set forth in the General Conditions in Part A pursuant to Rule 213(6)(a)(ii).

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APPENDICES

Appendix 2-1: Abbreviations and Acronyms

The following is an alphabetical listing of abbreviations/acronyms that may be used in this permit.

AQD	Air Quality Division	MM	Million
acf m	Actual cubic feet per minute	MSDS	Material Safety Data Sheet
BACT	Best Available Control Technology	MW	Megawatts
BTU	British Thermal Unit	NA	Not Applicable
°C	Degrees Celsius	NAAQS	National Ambient Air Quality Standards
CAA	Federal Clean Air Act	NESHAP	National Emission Standard for Hazardous Air Pollutants
CAM	Compliance Assurance Monitoring	NMOC	Non-methane Organic Compounds
CEM	Continuous Emission Monitoring	NOx	Oxides of Nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide	NSR	New Source Review
COM	Continuous Opacity Monitoring	PM	Particulate Matter
department	Michigan Department of Environmental Quality	PM-10	Particulate Matter less than 10 microns in diameter
dscf	Dry standard cubic foot	pph	Pound per hour
dscm	Dry standard cubic meter	ppm	Parts per million
EPA	United States Environmental Protection Agency	ppmv	Parts per million by volume
EU	Emission Unit	ppmw	Parts per million by weight
°F	Degrees Fahrenheit	PS	Performance Specification
FG	Flexible Group	PSD	Prevention of Significant Deterioration
GACS	Gallon of Applied Coating Solids	psia	Pounds per square inch absolute
gr	Grains	psig	Pounds per square inch gauge
HAP	Hazardous Air Pollutant	PeTE	Permanent Total Enclosure
Hg	Mercury	PTI	Permit to Install
hr	Hour	RACT	Reasonable Available Control Technology
HP	Horsepower	ROP	Renewable Operating Permit
H ₂ S	Hydrogen Sulfide	SC	Special Condition
HVLP	High Volume Low Pressure *	scf	Standard cubic feet
ID	Identification (Number)	sec	Seconds
IRSL	Initial Risk Screening Level	SCR	Selective Catalytic Reduction
ITSL	Initial Threshold Screening Level	SO ₂	Sulfur Dioxide
LAER	Lowest Achievable Emission Rate	SRN	State Registration Number
lb	Pound	TAC	Toxic Air Contaminant
m	Meter	Temp	Temperature
MACT	Maximum Achievable Control Technology	THC	Total Hydrocarbons
MAERS	Michigan Air Emissions Reporting System	tpy	Tons per year
MAP	Malfunction Abatement Plan	µg	Microgram
MDEQ	Michigan Department of Environmental Quality	VE	Visible Emissions
mg	Milligram	VOC	Volatile Organic Compounds
mm	Millimeter	yr	Year

*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 pounds per square inch gauge (psig).

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Appendix 2-2. Schedule of Compliance

The permittee certified in the ROP application that this stationary source is in compliance with all applicable requirements and the permittee shall continue to comply with all terms and conditions of this ROP. A Schedule of Compliance is not required. (**R 336.1213(4)(a), R 336.1119(a)(ii)**)

Appendix 2-3. Monitoring Requirements

The following monitoring procedures, methods, or specifications are the details to the monitoring requirements identified and referenced in EU-LIME-BIN and EU-ODOR-SCRUBBER.

EU-LIME-BIN

Monitoring of the bin vent fabric filter shall be in accordance with the procedures, methods, or specifications referenced in Table EU-LIME-BIN. Visual inspections for opacity and quarterly visual inspections of the control device will enable identification of any periods of fabric filter malfunction.

EU-ODOR-SCRUBBER

Monitoring of the oxidizing wet scrubber shall be in accordance with the procedures, methods, or specifications referenced in Table EU-ODOR-SCRUBBER. Daily verification of adequate liquid flow to the scrubber combined with weekly visual inspections for opacity will enable identification of any periods of scrubber malfunction.

New Source Review permitted a packed-bed, counter flow, vertical tower scrubber system, to operate on a continuous 24-hour per day schedule, with a design air flow of 21,700 cubic feet per minute. Sodium hydroxide is used to maintain pH of the scrubbing solution, while sodium hypochlorite is added to remove odors from the exhaust gas prior to discharge to the atmosphere.

Operation of the Odor Control System shall be in accordance with the "Compliance Assurance and Monitoring Plan for the Holland Wastewater Treatment Plant Odor Control System," last revised February 11, 2000, as amended.

Appendix 2-4. Recordkeeping

Specific recordkeeping requirement formats and procedures are detailed in Part A or the appropriate Source-wide, emission unit and/or flexible group special conditions. Therefore, this appendix is not applicable.

Appendix 2-5. Testing Procedures

There are no specific testing requirement plans or procedures for this ROP section. Therefore, this appendix is not applicable.

Appendix 2-6. Permits to Install

The following table lists any PTIs issued since the effective date of previously issued ROP No. 199600223.

Permit to Install Number	Description of Equipment	Corresponding Emission Unit(s) or Flexible Group(s)
NA	(None for this permit section.)	NA

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Appendix 2-7. Emission Calculations

There are no specific emission calculations to be used for this ROP section. Therefore, this appendix is not applicable.

Appendix 2-8. Reporting

A. Annual, Semiannual, and Deviation Certification Reporting

The permittee shall use the MDEQ Report Certification form (EQP 5736) and MDEQ Deviation Report form (EQP 5737) for the annual, semiannual and deviation certification reporting referenced in the Reporting Section of the Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Alternative formats must meet the provisions of Rule 213(4)(c) and Rule 213(3)(c)(i), respectively, and be approved by the AQD District Supervisor.

B. Other Reporting

Specific reporting requirement formats and procedures are detailed in Part A or the appropriate Source-Wide, Emission Unit and/or Flexible Group Special Conditions. Therefore, Part B of this appendix is not applicable.